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OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION REGULATION 19(2) SECOND REVISED DRAFT LOCAL PLAN

Integrated Impact Assessment Report

MAY 2018

Incorporating

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Hyder

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Non-Technical Summary

Introduction

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area. The plan period will be to 2038.

When preparing the Local Plan, it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. The term Integrated Impact Assessment (IIA) can be used to describe~~d~~ the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA). This IIA draws together the following impact assessments:

- SA and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

Independent consultants, Arcadis Consulting (UK) Ltd., have undertaken the IIA of the OPDC Regulation 19 (2) Second Revised Draft Local Plan. This Non-Technical Summary provides a high-level summary of the findings of the IIA.

Strategic Environmental Assessment and Sustainability Appraisal

SA is a process for assessing the social, economic and environmental impacts of a Plan as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European Strategic Environmental Assessment Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Natural England, Historic England and Environment Agency) and the public is also required at key stages.

Health Impact Assessment

The online National Planning Practice Guidance (NPPG) states that a health impact assessment may be a useful tool to use where there are expected to be significant impacts. The NHS London Healthy Urban Development Unit states that *'a health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals.'* Consequently, we are undertaking a high-level assessment of the possible health impacts of the Local Plan.

Equalities Impact Assessment

The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;

- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently, we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This has been integrated into the IIA process.

Habitats Regulations Assessment

It is a legal requirement that any plan or programme likely to have a significant impact upon a European site protected for nature conservation, which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). An HRA screening exercise has been undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a European protected site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. This is a parallel process to the IIA process and will be reported separately. It is noted that the full findings are published with this iteration of Local Plan and this IIA Report.

This HRA Screening exercise noted that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites. The closest European designated site is more than 7km away from the OPDC boundary.

It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan could be reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European designated sites through habitat degradation and increased recreational pressure. However, the Local Plan policies seek to mitigate this kind of impact and that coupled with standard mitigation measures that are required of such developments (such as pollution prevention) it is therefore unlikely that the OPDC Local Plan will have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.

Scope of the Appraisal

The scope of the IIA was determined through collecting information on the environmental, social and economic characteristics of the area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the IIA and the Local Plan. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies and the public in September 2015.

Following the consultation, responses were analysed and amendments made to the scope as appropriate. A finalised Scoping Report has been published and is available on OPDC's website.

Individual components of the Draft Local Plan have been assessed to determine their sustainability performance and to provide recommendations for sustainability improvements. The following elements have been assessed:

- The Local Plan's Spatial Vision;
- The Local Plan's Strategic Policies (including Place Policies and site allocations); and
- The Local Plan's Development Management Policies.

The SA process is iterative, with regular feedback occurring between the plan-makers and the SA team as plan options and policies are developed.

Key Sustainability Issues and Opportunities

To ensure that a robust assessment of the emerging Local Plan is undertaken, it is necessary to understand the existing conditions and characteristics of the OPDC area, for example, population dynamics, levels of

deprivation, health, employment patterns and the condition of housing stock and its affordability. These are detailed in the IIA Report. The list below identifies the sustainability topics covered in the IIA. Details of the identified issues and opportunities are provided in the IIA Report.

- Population: demographics and implications for service provision and housing.
- Education and qualifications: levels of attainment and implications of development on school places; gap between skills and suitable job availability.
- Human health: potential implications of opportunities for health improvements for quality of life and the economy.
- Crime: deprivation in relation to crime levels and potential opportunities for design measures.
- Water: river water quality; drainage; wastewater capacity; flood risk; and water efficiency/water sensitive design.
- Soil and land quality: contaminated land and the need for remediation.
- Air quality: existing air quality and opportunities/implications for construction practices and changes in land use.
- Climatic factors and energy: energy consumption and energy efficiency; and renewable/low carbon energy.
- Biodiversity: designated and important sites and protected species; potential impacts and opportunities to promote environmental improvements.
- Cultural Heritage: cultural heritage resource of the borough and consideration of the wider historic landscape including non-designated heritage and archaeological resources.
- Landscape and townscape: townscape character and green areas; access to and awareness of valued aspects and potential for improve design and legibility.
- Waste: recycling and composting rates; existing waste sites; sustainable waste management opportunities and waste apportionment/potential displacement.
- Transportation: accessibility and connectivity; congestion; opportunities for more sustainable modes of transport and improved connectivity.
- Noise: road and rail noise; opportunities to minimise effects.
- Local economy: local business characterisation; unemployment; infrastructure requirements and town centres; potential for employment and training, business opportunities and infrastructure capacity.
- Deprivation and Living Environment: high levels of deprivation and potential for improvements.
- Housing: housing tenure characteristics; housing needs; gypsy and traveller accommodation needs; opportunities for provision of a range of types and tenures.

IIA Framework for Assessment

The IIA Framework underpins the assessment methodology and comprises a series of sustainability objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. The IIA Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities. The IIA Framework was amended following receipt of the Scoping Report consultation responses from statutory consultees in 2015. The following Objectives form the basis of the IIA Framework. These are supported by a series of sub-objectives, indicators and targets, which can be found in the IIA Report (**Table 3-5**):

1. To enhance the built environment and encourage ‘place-making’
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land
4. Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs

6 Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect
7 To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy
8 To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste
9 Improve the quality of the water environment
10 Create and enhance biodiversity and the diversity of habitats across the area and its surroundings
11 To minimise air, noise and light pollution, particularly for vulnerable groups
12 To conserve and enhance the historic environment, heritage assets and their settings
13 Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare
14 Improve safety and reduce crime and the fear of crime
15 Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living
16 To improve the education and skills levels of all members of the population, particularly vulnerable groups
17 Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training
18 To encourage inward investment alongside investment within existing communities, to create sustainable economic growth

Developing and Refining Options and Assessing Effects

Spatial Vision and narratives

Government guidance advises that only reasonable alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Spatial vision for OPDC has been reviewed against the IIA Objectives, and a summary of the key strengths, weaknesses and recommendations are presented in Chapter 6 of the IIA Report. The assessment of the Spatial Vision narratives against the IIA Objectives has been undertaken during the IIA using a simple matrix based approach. Chapter 6 of the IIA Report presents the complete compatibility of the Spatial Vision narratives against the IIA Objectives.

Appraisal of Local Plan Policies

The Local Plan policies and policy options for development were assessed against the IIA Objectives using a matrix-based approach and first begun for the Regulation 18 Local Plan. This matrix allowed the identification of positive and negative impacts, as well as the potential for cumulative effects to occur. Mitigation measures and recommendations were suggested to offset or alleviate any predicted adverse impacts, or to enhance any opportunities that were identified. This iterative process has been continued into the Regulation 19 assessment ~~and~~ to which this report relates.

A summary of the assessment of these preferred policies is provided in Chapter 6 of the IIA Report. The complete results of the assessment are presented in Appendix D.

In summary, the majority of predicted effects were positive. The assessment led to the prediction of major positive effects against all of IIA Objectives. The volume of development being proposed within the OPDC boundary over the course of the Local Plan to 2038 is substantial. The catalysts that are Crossrail/HS2 will bring much needed improved connectivity for existing residents and business as well as open up the area for new mixed-use neighbourhoods and communities such as those proposed across Old Oak North and Old

Oak South in the longer term and Scrubs Lane in the short term. The direction of the Local Plan presents an opportunity to protect a significant Strategic Industrial Location (Park Royal) as well as create new employment and industrial floorspace for emerging industries and small businesses within this area. It also importantly sets out guidance for how Wormwood Scrubs will be conserved and enhanced as Metropolitan Open Land.

However, such a volume of development will not be without its challenges. The existing transport network, businesses and residents will be impacted by with a significant amount of change in their area over a long period of time. This natural conflict is acknowledged within the Local Plan policies~~,~~ and addressed with specific policies aimed at ensuring proposed development can adequately deal with effects on residential amenity including noise, air quality and construction impacts.

Overall, the Local Plan policies work well together in ensuring that this part of west London can be transformed into a mixed use area, providing much needed housing, across a range of tenures, employment floorspace, new social infrastructure, contributing to the greening of the area, generating benefits for existing communities and ensuring development is able to meet a changing climate.

Changes between Regulation 18 and Regulation 19(1) Policies

The Regulation 19(1) Draft Local Plan ~~has been~~was amended from the Draft Regulation 18 version in response to consultation comments, evidence base outputs and recommendations from OPDC's Place Review Group. This ~~has seen~~saw a change in the structure to provide a clearer differentiation between Strategic Policies, Place Policies and Development Management Policies. The draft reflects the role of a Regulation 19 document by providing proposed policies instead of policy options. Further emphasis on existing and future local communities ~~has also been~~was also provided.

The most significant changes between the two consultation stages ~~can be~~was seen in the Spatial Vision, Strategic Policies and the Places sections of the Local Plan. The Spatial Vision ~~now~~ was amended to recognise~~s~~ more fully how the OPDC area and the purpose of the Local Plan can help support its local current employment and residential offering whilst also at the same time address the inequalities that currently exist as it enables the creation of new neighbourhoods. The Vision also aims to place the geographical area of OPDC within its wider London setting. The Strategic Policies ~~have~~ evolved from the Overarching Spatial Policies and as a result of the restructuring of the Spatial Vision provides greater clarity in how the Old Oak and Park Royal Development Corporation envisages the area to look at end of the plan period.

When compared to the Regulation 18 Draft Local Plan, the Regulation 19(1) Draft Local Plan ~~provides~~ provided a much clearer emphasis, through its Places chapter, on pulling out the individual distinctiveness of its sub-areas, such as Park Royal's long industrial history, as well as recognising the forthcoming Crossrail/HS2 interchanges and how this is already changing the area and bringing investment into it. Specific Place and cluster policies give a much stronger direction as to how new and existing neighbourhoods can be developed and improved in order to ensure that the scale of development will respond to both the surrounding context and improved public transport connectivity. Site allocations ~~have also been~~ were also provided to define how many new homes and jobs will be provided.

The IIA Report ~~has been~~was previously updated to reflect both minor wording changes in policies between the Regulation 18 and ~~this version~~the previous version of this report, used to assess the Regulation 19(1) Revised Draft Local Plan~~, as well as assessed new policies where applicable~~. This is part of the iterative nature of the SA process. ~~The results of these assessments are presented in this IIA Report as well as the supporting Appendices. A draft IIA Monitoring Framework is proposed which links back to the Authority Monitoring Report and which emphasises how the IIA objectives can be measured against elements that the Planning Policy team are already considering.~~

Changes between Regulation 19(1) and Regulation 19(2)

Amendments have been made to the revised draft Local Plan in light of Regulation 19(1) consultation responses, updated and new supporting studies, the Draft New London Plan and changes to national planning guidance. The amendments are contained with the Regulation 19(2) Second Revised Draft Local Plan.

The IIA Report has been updated to assess the proposed changes set out in the Regulation 19(2) Second Revised Draft Local Plan.

~~to reflect both minor wording changes in policies between the Regulation 19 and this version, as well as undertaking the assessment of two Employment Policies (E1 and E2) which replaced their predecessors respectively.~~ This is part of the iterative nature of the SA process. The results of these assessments are presented in this IIA Report as well as the supporting Appendices. For transparency, these are set out as tracked changes to the previous Regulation 19(1) consultation. An IIA Monitoring Framework is proposed which links back to the Authority Monitoring Report and which emphasises how the IIA objectives can be measured against elements that the Planning Policy team are already considering.

Next Steps

~~This IIA Report has now been updated to reflect the outcome of the Regulation 19(1) consultation of the Draft Local Plan and includes the assessment of the Councils revisions to the Local Plan.~~ The ~~changes made to the~~ Regulation 19(2) Second Revised Draft Local Plan ~~-~~and Draft IIA Report and its Appendices as ~~a result of this stage~~ will now be consulted on for second time. ~~The Regulation 19 Draft Local Plan along with this accompanying IIA Report and associated appendices will be consulted on.~~ Following the close of the consultation period, OPDC will review the feedback and revise the Plan as appropriate. The IIA Report will then be updated to reflect the assessment of these amendments or additions prior to Submission. This IIA Report also include aspects relating to the SA process, such as a draft Monitoring Framework, as outlined in **Table 2-1** of this report.

If you would like to comment on this IIA Report, please send comments to:

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Abbreviations

AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CIL	Community Infrastructure Levy
cSAC	Candidate Special Area of Conservation
DECC	Department of Energy and Climate Change
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HUDU	NHS London Health Urban Development Unit
IIA	Integrated Impact Assessment
LNR	Local Nature Reserves
LSDC	The London Sustainable Development Commission
LSOA	Lower Super Output Area
NNR	National Nature Reserves
NPPG	National Planning Policy Guidance
NVQ	National Vocational Qualification
ONS	Office for National Statistics
OPDC	The Old Oak and Park Royal Development Corporation
OPDM	The Office of the Deputy Prime Minister's
ppha	persons per hectare
pSPA	Potential Special Protection Areas
RIGS	Regionally Important Geodiversity Sites
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SCI	Sites of Community Importance
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
WCED	World Commission on Environment and Development

1 Introduction

1.1 Purpose of the IIA Report

The Old Oak and Park Royal Development Corporation (OPDC) is currently consulting on the Regulation 19(2) Second Revised Draft Local Plan. This IIA Report has been prepared by Arcadis Consulting UK Ltd. (formerly Hyder Consulting (UK) Ltd.) on behalf of the OPDC, as part of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), incorporating Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) (hereinafter referred to as the Integrated Impact Assessment (IIA)) of the emerging Local Plan. Habitats Regulations Assessment Screening will also be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area.

The SA process commenced with a Scoping consultation in September 2015. The SEA Directive requires the authority preparing the plan to consult the Consultation Bodies on the scope and level of detail of the Environmental Report (in this case a full Integrated Impact Assessment Report, which will ultimately document the findings of the IIA). In addition to the Consultation Bodies, a public consultation was undertaken. The preparation of a Scoping Report provides the most effective means of undertaking this consultation by providing the consultees with a document upon which they can make comments. Consultation responses as a result of this were integrated into the Draft IIA Report prepared for the Regulation 18 Local Plan consultation.

This IIA Report is intended to document the assessment of the Regulation 19(2) Second Revised Draft Local Plan, which sets out preferred policy direction for the OPDC area. This stage assesses the Draft Local Plan in its entirety, with preferred policies and site allocations included. An appraisal of the Regulation 19(1) Draft Local Plan was previously undertaken in 2017, following this the Plan was amended as a result of the Regulation 19 consultation. This IIA Report has considered these revisions and has been updated accordingly in preparation for the Regulation 19(2) consultation. To deliver a transparent process, these revisions are provided in tracked changes. ~~It is noted that the version of the Regulation 19 Draft Local Plan assessed is dated 4th April 2017. Any changes to the text following this date have not been considered. Authors of the report are aware that no significant changes to the policy direction of the content of the Regulation 19 Draft Local Plan have been carried out since the assessment.~~

1.2 The Local Plan

Launched on 1 April 2015, the OPDC has been established by the Mayor of London, to take on powers of planning, regeneration, compulsory purchase orders and the ability to adopt and manage streets and space in the area covered by the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF). This new Local Planning Authority spans parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham and therefore takes on planning powers in the areas of these authorities that it covers. The OPDC boundary, including its relationship to its three constituent boroughs, is shown in **Figure 1-1**.

The OPDC's purpose is to *'use the once-in-a-lifetime opportunity of investment in HS2 and Crossrail, to develop an exemplar community and new centre in north-west London, creating opportunities for local people and driving innovation and growth in London and the UK'*[1].

The OPDC is a functional body of the Greater London Authority (GLA), working closely with a number of organisations including the Mayor of London, the GLA, Transport for London, central government, the local Boroughs of Brent, Ealing and Hammersmith & Fulham, residents in neighbouring local communities, local organisations, businesses, landowners, developers and regeneration agencies.

As a Local Planning Authority, the OPDC has a duty to prepare a Local Plan that sets its strategy for development within its area and the policies that will be used to direct development and determine applications for planning permission across the entire OPDC area. The plan period will be to 2038.

[1] https://www.london.gov.uk/priorities/planning/old-oak-park-royal

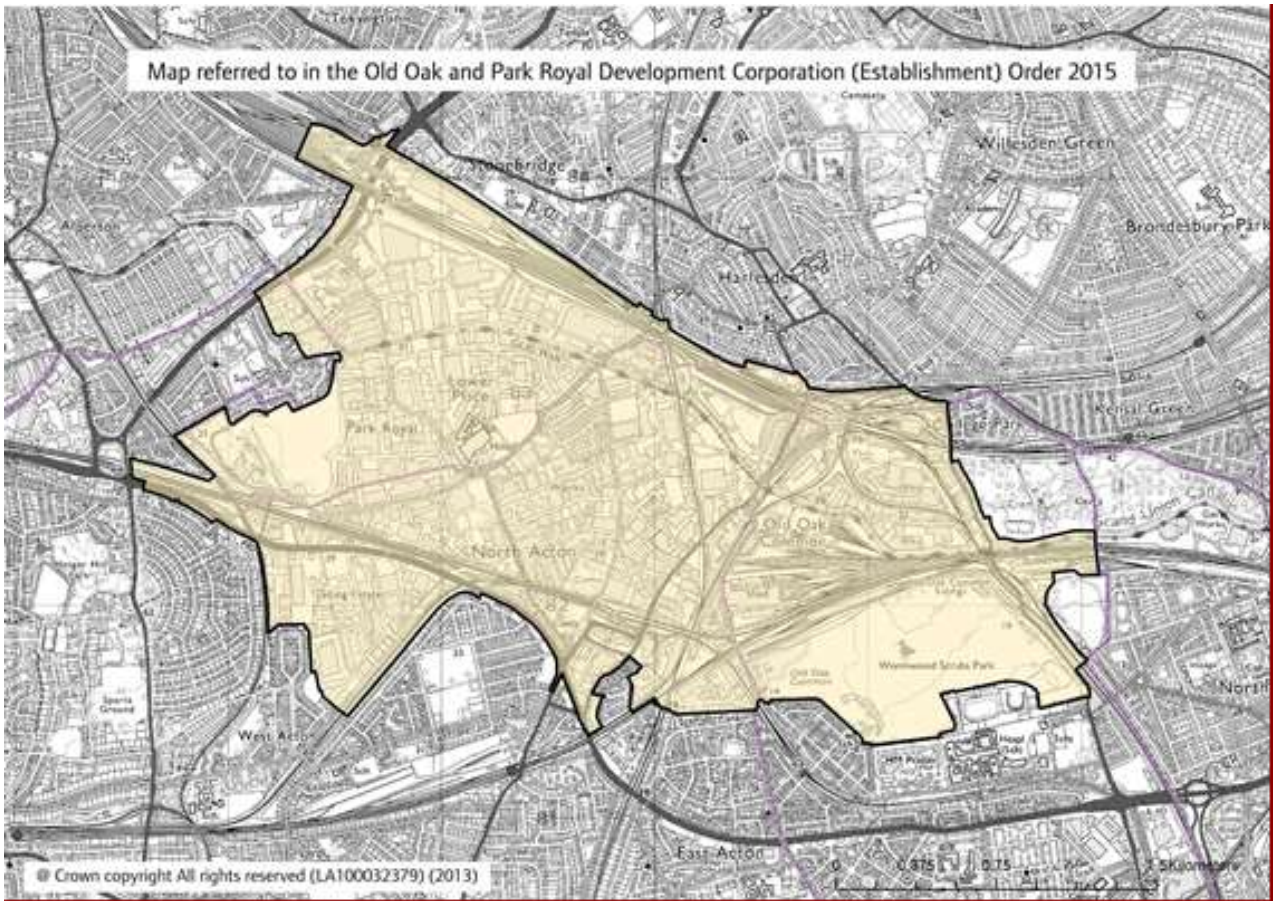
Until the OPDC adopts its own Local Plan for the OPDC area, the Boroughs' Local Plans will apply to the areas that they cover. **Figure 1-1** shows the areas covered the three constituent Local Authorities of the London Borough of Brent; the London Borough of Ealing; and the London Borough of Hammersmith and Fulham.

1.3 The London Plan and Opportunity Area Planning Framework

The London Plan is the overall strategic plan for London, and forms part of the development plan for the OPDC. The London Plan sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. London boroughs' Local Plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.

The Opportunity Area Planning Framework for Old Oak and Park Royal provides supplementary guidance to the London Plan to help to shape the regeneration of Old Oak and enhancement of Park Royal. This was adopted by the Mayor of London on 4 November 2015.

Figure 1-1 OPDC Boundary



1.4 Sustainable Development

The concept of sustainable development is central to the planning system. The term 'sustainable development' has been used since 1987 following the publication of the World Commission on Environment and Development (WCED) report 'Our Common Future' (The Brundtland Report). It called for a strategic that united development and the environment, and defined 'sustainable development' as:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'

The UK Government has produced a Sustainable Development Strategy, 'Securing the Future' (March 2005). Priority areas for immediate action are outlined as:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

To achieve forms of development that are more sustainable than previous development, proposals must strike an acceptable balance between maximising resource and energy efficiency; minimising environmental impacts; delivering social benefits; and supporting a healthy economy. The London Sustainable Development Commission (LSDC) provides advice to the mayor to help make London more sustainable as it continues to develop and grow. The priorities of LSDC are as follows:

- **London Infrastructure Plan 2050:** The Mayor has asked the Commission to advise on the London Infrastructure Plan 2050. The LSDC Chair is a member of the Infrastructure Delivery Board.
- **Circular Economy:** The LSDC sees waste as an opportunity to create new jobs and industries. This is why it's exploring ways to support London's move to a circular economy. In such an economy, waste is no longer considered just rubbish, but a resource of raw materials that has value.
- **Energy:** The LSDC will be exploring a range of issues around energy in the capital. This includes energy efficiency, and decentralised energy, meaning energy which is produced close to where it's used. The Commission will also look at how Londoners can overcome barriers to solar panel uptake in the capital. Progress here could also achieve greater investment in community infrastructure projects.
- **Green Economy:** The LSDC has made recommendations on ways to speed up the growth of London's low carbon goods and services sector. It is now helping to determine how these measures might be achieved. The LSDC is also helping to raise the capital's profile as a centre for 'cleantech' – technology which is environmentally friendly.

Relevant national and London based guidance has been considered and adhered to as part of this IIA. Where relevant, this has been referenced and reflected in the review of PPPs and the IIA Framework in Chapter 6.

1.5 Integrated Impact Assessment

The term Integrated Impact Assessment (IIA) can be used to described the process of covering more than one type of impact assessment into a single process. Integrating different types of impact assessment into a single process can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations for policy makers. Where more detail on certain issues is required or necessary, this can be undertaken and included within the IIA. This approach has been adopted by the Mayor of London, who has taken an integrated approach to assessing the impacts of his strategies, incorporating the requirements of SEA, SA, HIA, and EqIA. This IIA draws together the following impact assessments:

- Sustainability Appraisal and Strategic Environmental Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Habitats Regulations Assessment (HRA Screening will be undertaken as a parallel process, the findings of which will be integrated into the IIA as appropriate).

The following text provides further detail of each of the component impact assessments in turn. Section 3 provides further detail about how the assessment processes will be integrated.

1.6 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic, and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process.

It is a legal requirement that Local Plans are subject to SA, under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations.

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of the SEA Directive states that the aim is to:

'Provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.'

It is possible to combine the processes of SEA and SA, as they share a number of similarities. National Planning Policy Guidance (NPPG) promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted here. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the Integrated Impact Assessment for the new Local Plan. This Scoping Report includes a series of boxes which clearly identify the specific requirements of the SEA Directive that need to be fulfilled.

1.7 Health Impact Assessment

The online National Planning Practice Guidance (NPPG)[2] states that:

'Local planning authorities should ensure that health and wellbeing, and health infrastructure, are considered in local and neighbourhood plans and in planning decision making…A health impact assessment may be a useful tool to use where there are expected to be significant impacts.'

According to the NHS London Healthy Urban Development Unit:

'A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals.

Consequently, we are undertaking a high-level assessment of the possible health impacts of the Local Plan. As the OPDC is a pioneer for having public health expertise based within its core team, they have already ensured that public health expertise is, and will be, provided by the Local Authorities, Transport for London, GLA Health Team and Public Health England, as well as from OPDC Health Advisor. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

1.8 Equalities Impact Assessment

The Equality Act 2010 includes a public sector equality duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations between communities.

Consequently, we are undertaking a high-level assessment of the possible equalities impacts of the Local Plan. This will be integrated into the IIA process. Further details on the scope of the assessment and how the processes will be integrated can be found in Sections 2 and 3 of this report.

1.9 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC) and Special Protection Area (SPA), which is not directly concerned with the management of the site for nature conservation, must be subject to an

[2] http://planningguidance.planningportal.gov.uk/blog/guidance/health-and-wellbeing/what-is-the-role-of-health-and-wellbeing-in-planning/

Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA). In addition it is a matter of law that candidate SACs (cSACs), Sites of Community Importance (SCI), Ramsar sites and potential SPAs (pSPAs) are also considered in this process.

A HRA screening exercise has been undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval.

This is a parallel process to the IIA process and will be reported separately. However, its findings will be relevant to the IIA and *vice versa* so the two processes will need to interact. The NPPG[3] states that, *'the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken.'* The findings of the HRA screening exercise have been considered in this IIA Report where relevant. The HRA screening exercise, in the form of a Report, is submitted alongside this IIA and Regulation 19(2) Second Revised Draft Local Plan.

1.10 Consultation

1.10.1 SA Workshop

A scoping workshop was held in July 2015 with attendees from a range of organisations including officers from: the GLA; Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The findings of this workshop have contributed to this report. Further details of the specific findings of the workshop are provided in **Appendix A**.

1.10.2 Formal Consultation

In accordance with regulation 12(5) of the SEA Regulations, the Scoping Report was consulted upon for a five-week period, commencing in September 2015. The statutory SEA bodies consulted were:

- Natural England;
- Historic England; and,
- The Environment Agency.

A draft IIA Report was, alongside the Regulation 18 Draft Local Plan, consulted on between 4th February and 31st March 2016. Comments received have been integrated into this IIA Report. The consultation responses relevant to the IIA Report are document in **Appendix ~~B~~C.**

The Regulation 19(1) Draft Local Plan, along with its draft IIA Report was consulted on in the summer of 2017, with those responses relevant to the IIA Report contained in **Appendix C.**

1.10.3 Additional Consultation

An important element of the IIA, HIA and EqIA in particular, is to engage the community throughout the development of the Local Plan. OPDC officers have met with community groups prior to the Regulation 19(2) consultation and will continue to do so during and after the formal consultation period.

1.11 Structure of this Draft IIA Report

This IIA Report provides a summary of the IIA process so far and documents the findings and recommendations of the assessment. It will be used as a consultation document and issued to statutory bodies and stakeholders for comment alongside the Regulation 19(2) Second Revised Draft Local Plan.~~.~~

It is essential that this Draft IIA Report is read alongside the OPDC Regulation 19(2) Second Revised Draft Local Plan.

[3] http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-apraisal-requirements-for-local-plans/

2 The IIA Process

2.1 Stages in the IIA Process

The Office of the Deputy Prime Minister's (OPDM) Practical Guide[4] as well as NPPG (March 2014), provide guidance on conducting an SA. This will be followed for the purposes of the IIA. The five main stages in conducting an SA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

Table 2-1 presents the key stages in the SA process. This IIA Report documents the findings of Stages ~~B~~ D (~~second~~ fourth part), Stage C is this report itself and Stage D continues to ~~will~~ be the consultation that will run as part of the Regulation 19(2) Local Plan consultation. The table also demonstrates how each of the SA (including SEA), HIA, EqIA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the Local Plan.

[4] ODPM (2005) A Practical Guide to the SEA Directive

Table 2-1 Stages in the II*A* Process

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this IIA Report
Determining the scope of the Local Plan including specifying the opportunities or issues the authority wants to solve	**A. Setting the context and objectives, establishing the baseline and deciding on the scope**	Identify related plans/programmes		Identify health related plans/programmes (as part of SA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Completed as part of Reg 18
		Identify environmental protection objectives		Derivation of health - related themes	Derivation of equality-related themes	Completed as part of Reg 18
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the OPDC area	Gather baseline data relating to health (as part of SA)	Baseline data and likely future trends	Completed as part of Reg 18
		Identify sustainability issues and opportunities	Contact Natural England for details of all European sites (including conservation objectives) and consultation purposes	Identify health specific issues and relevant health determinants using the London Healthy Urban Development Unit tool (as part of SA)	Identify equalities specific issues	Completed as part of Reg 18
		Develop objectives, indicators and targets (Assessment Framework)	Liaise with SA team to ensure the Assessment Framework covers European sites appropriately	Ensure inclusion of health specific objectives, indicators and targets in SA Assessment Framework	Ensure inclusion of equalities specific objectives, indicators and targets in SA Assessment Framework	Completed as part of Reg 18
		Prepare SA Scoping Report, incorporating HRA and HIA	HRA information incorporated in SA Scoping Report	HIA information incorporated in SA Scoping Report.	EqIA information incorporated in SA Scoping Report.	Completed as part of Reg 18
		Consult on the scope of the SA including HIA,	*Consultation as part of SA Scoping Report consultation*	*Consultation as part of SA Scoping Report consultation.*	*Consultation as part of SA Scoping Report consultation.*	Completed as part of Reg 18

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this IIA Report
		EqIA and HRA (5 weeks)	*including consultation with Natural England*			
	Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage.					Completed as part of Reg 18
Generating options and preferred options for the strategy and implementation plan to resolve these challenges; appraising the options and predicting their effects (Regulation 18 Local Plan)	**B1/B2. Developing, refining and appraising strategic options, policy options and preferred policy options.**	Assess objectives against the Assessment Framework		HIA effects evaluated through SA Framework – including mitigation	EqIA effects evaluated through SA Framework	Completed as part of Reg 18
		Develop, refine and appraise strategic options	Consider HRA implications of the options.		Screening exercise of proposed strategic options	Completed as part of Reg 18
		Evaluate/select preferred policy options				Completed as part of Reg 18
	C. Prepare Initial SA Report					Completed as part of Reg 18
Consultation on Local Plan (Regulation 18)	Consultation on Initial SA Report (non-statutory)					Completed as part of Reg 18
	Review of consultation responses and necessary actions to inform next stage					**This report** amended following Reg 18 and 19(1) consultation responses
Selecting finalised preferred policy options for the strategy and implementation	**B3/B4. Assessing the effects of the Local Plan Preferred Options**	Predict and assess effects of options taken forward		HIA effects evaluated through SA Framework – including mitigation	EqIA effects evaluated through SA Framework	**Previous issue of this report, this report and Appendix D**
		Proposed mitigation measures				**Previous issue of this report this report and**

Local Plan Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulation Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in this IIA Report
plan and deciding priorities						**Appendix D~~This report and Appendix D~~**
		Propose monitoring programme	Monitoring as part of SA	Monitoring as part of SA	Monitoring as part of SA	**Previous issue of this report, this report and Chapter 8~~This report – Chapter 8~~**
Production of the Draft Local Plan	**C. Prepare SA Report**		HRA Screening of draft Local Plan. HRA Screening Report produced separately and *sent to Natural England for agreement of findings.*	HIA documented in SA Report, documented through appropriate SA objectives	EqIA documented in SA Report, documented through appropriate SA objectives	**~~This report~~Previous issue of this report**
Consultation of Draft Local Plan (Regulation 19)	**D. Consultation on the SA Report**		As above.	*HIA Consultation included in SA Report consultation*	*EqIA Consultation included in SA Report consultation*	**Previous issue of this report~~This report~~**
Production of Final Local Plan	**D. Prepare a supplementary or revised SA Report if necessary**	Assess significant changes	Prepare updated HRA Report following Natural England comments (if necessary).	HIA assessment of significant changes undertaken as part of SA and options around mitigation or reduction of effect identified	EqIA assessment of significant changes undertaken as part of SA	**Previous issue of this report, this report and Appendix D~~Stage to be completed~~**
		Prepare supplementary or revised SA Report				**Previous issue of this report, this report and Appendix D~~Stage to be completed~~**
Adoption of Local Plan	**D. SA Statement**					**Stage to be completed**

3 Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on the Scope

3.1 Introduction

Setting the context and objectives as well as establishing the baseline and scope was discussed as part of Stage A of the SA Process. The following section describes Stage A of the SA process, as documented in the Scoping Report. Consultation comments from the Scoping Report consultation in September 2015 and the consultation commented for the Regulation 18 consultation have been reflected through the iterations of the Local Plan.

3.2 Spatial Scope

The proposed study area for the IIA of the Local Plan is shown in **Figure 1-1**.

3.3 Aspects of the Local Plan to be assessed and how

The framework of policies and proposals contained within the Local Plan will seek to regulate and control the development and use of land and to provide the basis for consistent and transparent decision making on individual planning applications. As options emerge, each of its components will be assessed to determine sustainability performance and to provide recommendations for sustainability improvements. The Local Plan includes policies and proposals, grouped under the following headings, per the Regulation 19(2) Second Revised Draft Local Plan:

1. Spatial vision and narratives
2. Strategic Policies (including site allocations)
3. Places and, Clusters ~~and Site Allocations~~
4. Design
5. Environment and Utilities
6. Transport
7. Housing
8. Employment
9. Town Centre and Community Uses
10. Delivery and Implementation

The intention has been, throughout the ~~Regulation 18 and Regulation 19~~various stages of assessment~~s~~, to ensure that the process is iterative while maintaining an independent assessment with regular feedback occurring between the plan-makers and the IIA team, as options are developed.

The method adopted to assess each element of the plan has been slightly different, for example, the spatial vision and narrative has been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives.

However, a more detailed assessment of the preferred policies has been undertaken using an assessment matrix.

3.4 Assessment of Alternatives

It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options have been assessed using the IIA Framework. In accordance with NPPG:

'The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.'

Alternatives must be realistic and are likely to emerge from the plan-making process. However, the SEA can encourage further thinking around alternatives, and highlight where environmentally preferable options exist. Alternatives have been a focus for several legal challenges within the UK[5], and so it is important to ensure reasonable alternatives are meaningfully considered. If there are genuinely no reasonable alternatives to a plan, alternatives should not be artificially generated.

OPDC's Local Plan operates in a hierarchy of strategic planning policy documents that have been subject to their own IIAs.

The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified that the preferred option was to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal Opportunity areas are referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015 and subject to an IIA. The current London Plan (2016) and the Draft New London Plan (2017) also continue to set out these homes and jobs targets. In light of these strategic planning documents defining the housing and jobs targets for the Old Oak and Park Royal, alternative development capacities are not considered to be reasonable alternatives and have therefore not been assessed.

Overarching strategic options were assessed ahead of the drafting of the Regulation 18 Local Plan. The purpose of the assessment was to determine the sustainability strengths and weaknesses of each option, such that this information would be used by the plan-makers to develop the plan's policy options and preferred policies (section 6.3). The preferred policies and policy options were then assessed alongside one another in detail, which enabled a comparison of their predicted sustainability effects, to inform the development of the preferred policies. A matrix was used for this assessment enabling the policies and options to be easily compared.

Following the Regulation ~~18~~ 19(1) consultation of the Draft Local Plan, the Plan for the Regulation 19(1) consultation has been amended and restructured. The Regulation 19(2) Second Revised Draft Local Plan takes into consideration the draft IIA findings, evidence outputs and review by the OPDC Place Group to reflect a more coherent structure between evidence outputs and the strategic direction that the Local Plan wants to take the area in throughout its plan cycle.

This report documents the second part of Stage B of the SEA process and represents Stage C and D of the SA Process. This IIA Report, is being published alongside the Regulation 19(2) Second Revised~~version of the~~ Draft Local Plan.

[5] Save Historic Newmarket Ltd v Forest Heath DC [2011] EWHC 606 (Admin) (25 March 2011)

Heard v Broadland DC [2012] EWHC 344 (Admin) (24 February 2012)

Cogent Land LLP v Rochford DC [2012] EWHC 2542 (Admin); (21 September 2012)

Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government [2014] EWHC 406 (Admin) (21 February 2014)

3.5 Temporal Scope

The Local Plan will set out policies for the period to 2038. This has been used as the temporal scale for the IIA although effects that may last beyond this period will also be identified. This will help to identify whether effects are likely to be permanent (i.e. irreversible at least through the lifetime of the proposed measure/scheme) or temporary.

3.6 Technical Scope

3.6.1 SEA

The SEA Directive and the SEA Regulations require that the 'likely significant' effects on the environment are assessed, considering the following factors and interrelationship between them:

- Biodiversity;
- Population;
- Human health;
- Fauna and flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage; and
- Landscape.

The above topics, therefore, form the technical scope of the SEA.

The SEA Directive requires 'material assets' to be considered within SA. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is considered that the material assets of the area are appropriately covered in the following baseline sections, and consequently will not be repeated as a separate section:

- Biodiversity, Flora and Fauna;
- Soils and Geology;
- Cultural Heritage;
- Landscape;
- Housing; and
- Transportation.

3.6.2 HIA

The NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013)6 guidance lists the following health determinants, to be considered as a part of an assessment into health impacts:

[6] http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf

1. Housing quality and design;
2. Access to healthcare services and other social infrastructure;
3. Access to open space and nature;
4. Air quality, noise and neighbourhood amenity;
5. Accessibility and active travel;
6. Crime reduction and community safety;
7. Access to healthy food;
8. Access to work and training;
9. Social cohesion and lifetime neighbourhoods;
10. Minimising the use of resources; and
11. Climate change.

The HIA elements of the IIA will therefore seek to assess the Local Plan in terms of its effects on the health of the local community, with wider effects being considered where relevant. This might include communities in the surrounding area, incoming residents and people coming in for work, visiting or just travelling through. This will encompass the determinants described above, where they relate to land use planning. There will be work developed around mitigating issues that impact negatively on health – physical, mental and emotional.

Within the assessment process, the HIA has been integrated throughout the IIA Framework (see section 3), with health, and impact on health, being considered under all relevant objectives. Most notably, however, the 'human health' topic of SEA will be expanded upon, to ensure that relevant baseline data, key sustainability issues and opportunities, objectives and mitigation is identified. **Table 2-1** provides further information on how the HIA process will integrate with the IIA process.

3.6.3 EqIA

The EqIA process is designed to ensure that projects, policies and practices do not discriminate or disadvantage people and also to enable consideration of how equality can be improved or promoted. The EqIA will consider the impact of a proposal on relevant groups who share characteristics which are protected under the Equality Act (age, disability, race, faith, gender (including gender reassignment), sexual orientation, pregnancy and maternity, marriage and civil partnership) as well as others considered to be vulnerable within society such as low income groups.

This Draft IIA Report, which integrates the requirements of EqIA, sets out the matters that have been identified as relevant for consideration in the EqIA. The EqIA seeks to identify those groups that may be affected by the proposals, to analyse what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse impacts. Within the assessment process, the EqIA will be integrated throughout the IIA Framework (see section 3.7), with equalities issues being considered under all relevant objectives. **Table 2-1** provides further information on how the EqIA process will integrate with the IIA process.

3.6.4 HRA

Within the OPDC area there are no internationally designated SACs, SPAs or Ramsar sites. The closest to the site are listed in **Table 3-1**. An HRA screening exercise will be undertaken to determine if they (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. This is a parallel process to the IIA process and will be reported separately.

Table 3-1 Statutory sites of international nature importance within 20km of the OPDC area

Name of Site	Identification Number	Designation	Approximate distance from OPDC boundary
Richmond Park	UK0030246	SAC	7.3km south
Wimbledon Common	UK0030301	SAC	8.3km south
Lee Valley	UK9012111	SPA	14.3km north-east
Lee Valley	UK11034	Ramsar Site	14.3km north-east
South West London Waterbodies	UK9012171	SPA	16.3km south-west
South West London Waterbodies	UK11065	Ramsar Site	16.3km south-west
Epping Forest	UK0012720	SAC	17.8km north-east

3.7 Review of Relevant Plans, Programmes and Environmental Objectives

3.7.1 Introduction

The box below stipulates the SEA Directive requirements for this stage of the process.

Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives

'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmers' (Annex 1 (a)).

'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))

- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Local Plan.

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised in **Tables 3-2 and 3-3**. Further details are presented in **Appendix B**.

Table 3-2 Review of Plans, Policies and Programmes

Plan, Policy or Programme	Directly Relevant Process
International / European	

Plan, Policy or Programme	Directly Relevant Process
European Directive 2001/42/EC (SEA Directive)	SEA
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats	HRA, SEA
European Directive: Environmental Noise Directive 2002/49/EC	SEA, HIA, EqIA
EU Directive on Ambient Air Quality and Management 96/62/EC	SEA, HIA, EqIA
Water Framework Directive 2000/60/EC	SEA
Waste Framework Directive 2008/98/EC	SEA
Urban Waste Water Treatment Directive 91/271/EEC	SEA, HIA
Directive on the Promotion of the Use of Energy from Renewable Sources 2009/28/EC	SEA
Health for Growth 2014-2020, European Commission, 2011	HIA, SEA
European Convention on the Protection of the Archaeological Heritage (revised), 1992	SEA
European Landscape Charter 2000	SEA
National	
Greater London Authority Act 1999	HIA, EqIA
Equality Act 2010	HIA, EqIA
Wildlife and Countryside Act 1981	HRA
Flood and Water Management Act 2010	SEA, HIA
Energy Act 2013	SEA
Climate Change Act 2008	SEA, HIA, EqIA
Planning (Listed Building and Conservation Areas) Act 1990	SEA
Ancient Monuments and Archaeological Areas Act 1979	SEA
UK Climate Change Programme 2006	SEA, HIA, EqIA
National Planning Policy Framework, Department for Communities and Local Government, March 2012	SEA, HIA, EqIA
National Planning Policy for Waste, October 2014	SEA, HIA, EqIA
Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015	SEA, EqIA

Plan, Policy or Programme	Directly Relevant Process
The UK Government Sustainable Development Strategy, HM Government, 2005	SEA, HIA, EqIA
The UK Low Carbon Transition Plan, HM Government, July 2009	SEA
The Carbon Plan, HM Government, December 2011	SEA
UK Renewable Energy Strategy, HM Government, 2009	SEA
Future Water: The Government's Water Strategy for England, Department for Environment, Food and Rural Affairs, June 2011	SEA, HIA
UK Post-2010 Biodiversity Framework, Joint Nature Conservation Committee and Department for Environment, Food and Rural Affairs, 2012	SEA
White Paper: Healthy Lives, Healthy People: our strategy for Public Health in England, Department for Health, June 2011	SEA, HIA, EqIA
UK Air Quality Strategy, Department for Environment, Food and Rural Affairs, 2011	SEA, HIA, EqIA
Noise Policy Statement for England, Department for Environment, Food and Rural Affairs, March 2010	SEA, HIA, EqIA
Policy statement: Planning for schools development, Department for Communities and Local Government, August 2011	SEA, EqIA
Written Ministerial Statement: Sustainable Drainage Systems, December 2014	SEA, HIA, EqIA
National Planning Policy Guidance (NPPG)	SEA, HIA, EqIA
Historic England 'The setting of Heritage Assets' 2015	SEA
Historic England 'Tall Buildings' 2015	SEA
White Paper: Fixing our broken housing market 2017	SEA, HIA, EqIA
Regional / London	
The Mayor's Supplementary Planning Guidance on Character and Context (2014)	SEA, HIA, EqIA
The London Plan: Spatial Development Strategy for Greater London, Greater London Authority, July 2011	SEA, HIA, EqIA
The London Plan: The Spatial Development Strategy for Greater London (Draft), Greater London Authority, December 2017	SEA, HIA, EqIA
Revised Early Minor Alterations to the London Plan, Greater London Authority, October 2013	SEA, HIA, EqIA
Further Alterations to the London Plan, Greater London Authority, March 2015	SEA, HIA, EqIA
Draft Minor Alterations to the London Plan 2015 – Housing Standards, and Parking Standards, Greater London Authority, May 2015	SEA, HIA, EqIA

Plan, Policy or Programme	Directly Relevant Process
Land for Industry and Transport Supplementary Planning Guidance, Greater London Authority, September 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance, Greater London Authority, March 2012	SEA, HIA, EqIA
London Infrastructure Plan 2050 update, March 2015	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance on Housing, Greater London Authority, November 2012	SEA, HIA, EqIA
London Plan Social Infrastructure Supplementary Planning Guidance, May 2015	SEA, HIA, EqIA
London Plan Town Centres Supplementary Planning Guidance, July 2014	SEA, HIA, EqIA
London Plan Supplementary Planning Guidance, Sustainable Design and Construction, Greater London Authority, April 2014	SEA, HIA, EqIA
London Plan The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	SEA, HIA, EqIA
London's Waste Resource: The Mayor's Municipal Waste Management Strategy, November 2011	SEA, HIA, EqIA
London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, December 2014	SEA, HIA, EqIA
Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance, Greater London Authority, 2012	SEA, HIA, EqIA
Green Infrastructure and Open Environments: London's Foundations: Protecting the geodiversity of the capital: Supplementary Planning Guidance, Greater London Authority and London Geodiversity Partnership, March 2012	SEA
Securing London's Water Future, Greater London Authority, October 2011	SEA, HIA
The Mayor's Food Strategy: Healthy and Sustainable Food for London, London Development Agency, May 2006	SEA, HIA, EqIA
Delivering London's Energy Future: The Mayor's Climate Change Mitigation and Energy Strategy, Greater London Authority, October 2011	SEA, HIA
Managing Risks and Increasing Resilience: The Mayor's Climate Change Adaption Strategy, Greater London Authority, October 2011	SEA, HIA
Cultural Metropolis: The Mayor's Culture Strategy, Greater London Authority, November 2010 and Achievements and Next Steps, Greater London Authority, Greater London Authority, 2014	SEA, HIA, EqIA
The London Health Inequalities Strategy, Greater London Authority, April 2010	SEA, HIA, EqIA
Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan, Greater London Authority, October 2007	EqIA

Plan, Policy or Programme	Directly Relevant Process
River Basin Management Plan. Thames River Basin District, Environment Agency, December 2009	SEA
The Mayor's Economic Development Strategy for London, Greater London Authority, May 2010	SEA, EqIA
Mayor's Biodiversity Strategy: Connecting with London's Nature, Greater London Authority, July 2002	SEA, HRA, HIA
Improving Londoners Access to Nature: London Plan Implementation Report, Greater London Authority, February 2008	SEA, HIA
London Biodiversity Action Plan, London Biodiversity Partnership, 2001	SEA, HIA
Clearing the Air: The Mayor's Air Quality Strategy, Greater London Authority, December 2010	SEA, HIA
Sounder City: The Mayor's Ambient Noise Strategy, Greater London Authority, March 2004	SEA, HIA
London View Management Framework Supplementary Planning Guidance, Greater London Authority, March 2012	SEA
Mayor's Transport Strategy, Greater London Authority, May 2010	SEA, HIA, EqIA
The Mayor's Equality Framework: Equal Life Chance for All, Greater London Authority, 2009	EqIA
West London	
West London Joint Waste Plan to 2031: London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond Upon Thames, July 2015	SEA, HIA
West London Sub Regional Transport Plan, Transport for London, 2014 update	EqIA, SEA, HIA
Local	
Old Oak and Park Royal Opportunity Area Planning Framework, Greater London Authority, February 2015	SEA, HIA, EqIA
Cumberland Park Factory Conservation Area Appraisal Report 2016	SEA, HIA, EqIA
Brent	
London Borough of Brent Local Development Framework, Core Strategy, Brent Council, July 2010	SEA
Brent Parks Strategy 2010-2015, Brent Council, publication date unknown	SEA, HIA, EqIA
Food for Thought: A Food Growing and Allotments Strategy for the London Borough of Brent and Action Plan 2014/16, Brent Council, publication date unknown	SEA, HIA, EqIA
Community Safety Strategy 2014-17, Safer Brent Partnership, publication date unknown	SEA, HIA, EqIA

Plan, Policy or Programme	Directly Relevant Process
Brent Equality Strategy 2015-19, Brent Council, April 2015	EqIA
Brent Health and Wellbeing Strategy 2014-17, Brent Council and NHS Brent, publication date unknown	SEA, HIA, EqIA
Cultural Strategy for Brent 2010-15, Brent Council, publication date unknown	EqIA
A Regeneration Strategy for Brent 2010-2030, Brent Council, publication date unknown	SEA, HIA, EqIA
A Plan for Children and Families in Brent 2012-15, Brent Council, publication date unknown	EqIA
Ealing	
The Development Strategy 2026: Ealing Core Strategy, Ealing Council, April 2012	SEA
Sustainable Community Strategy 2006-2016 Ealing Council, Refresh July 2011	SEA, HIA, EqIA
Ealing Quality of Life for Older People 2006-2016, Ealing Council, publication date unknown	HIA, EqIA
Arts and Cultural Strategy 2013-2018, Ealing Council, publication date unknown	SEA, EqIA
Ealing Green Space Strategy 2012-2017, Ealing Council, November 2012	EqIA, HIA, SEA
Park Royal Southern Gateway Position Statement, Final Draft, London Borough of Ealing, April 2008	SEA
Hammersmith and Fulham	
Hammersmith and Fulham ~~Core Strategy~~Local Plan, Hammersmith and Fulham Council, ~~October~~ (February ~~2011~~2018)	SEA
Hammersmith and Fulham Housing Strategy: Delivering the change we need in housing, Hammersmith and Fulham Council, May 2015	EqIA, HIA, SEA
Draft Hammersmith and Fulham Health and Wellbeing Strategy 2016-2021, Hammersmith and Fulham Council, publication date unknown	EqIA, HIA, SEA
Parks and Open Spaces Strategy 2008-2018, Hammersmith and Fulham Council, July 2008	EqIA, HIA, SEA
Hammersmith and Fulham CSPAN Physical Activity Strategy 2011-2016, Hammersmith and Fulham Council, November 2011	EqIA, HIA, SEA
Updated Surface Water Management Plan 2015, Hammersmith and Fulham Council, April 2015	SEA, HIA
Kensington and Chelsea	
Consolidated Local Plan (July 2015)	EqIA, HIA, SEA
Surface Water Management Plan (SWMP, February 2014)	EqIA, HIA, SEA

Plan, Policy or Programme	Directly Relevant Process
Local Flood Risk Management Strategy (LFRMS, July 2015)	SEA
Issues and Options Paper for Kensal Gasworks (June 2012)	EqIA, HIA, SEA
St Quintin and Woodlands Draft Neighbourhood Plan (May 2015)	EqIA, HIA, SEA

3.7.2 Key Results from the Review

Environmental, social and economic objectives and issues identified in the review of plans, programmes and environmental protection objectives (PPPs) of relevance to the IIA were used to generate a series of common themes. Appendix B presents a summary of how the identification of common themes relates to each of the PPPs reviewed. How these themes relate to the relevant assessment processes is presented in **Table 3-3**. The results of this assessment have been used to inform the development of the draft IIA Framework. How the resulting draft Objectives relate to the identified themes is also shown in **Table 3-3**.

Table 3-3 Results of the review of Plans, Policies and Programmes

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Environmental		
Optimise the use of land through increasing the density of development	SEA: Soil, Material Assets, Population	2, 3, 4, 7, 17, 18
Promote sustainable design and mitigate and adapt to climate change	SEA: Human Health, Population, Climatic Factors, Material Assets; HIA; EqIA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 15
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	SEA: Human Health, Population, Climatic Factors, Water, Material Assets; HIA; EqIA	3, 6, 7, 8, 9, 10, 15
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in appropriate locations	SEA: Climatic Factors, Air, Material Assets, Population	4, 6, 7, 8
Promote sensitive waste management	SEA: Material Assets, Climatic Factors, Population, Human Health, Soil, Landscape; HIA, EqIA	3, 7, 8, 9, 10, 11, 15
Protect and enhance the historic environment and recognise and recognise and appreciate landmarks, townscapes and their setting	SEA: Material Assets, Cultural Heritage, Population, Landscape	1, 2, 3, 5, 6, 7, 8, 12, 13, 18
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	HRA; SEA: Biodiversity, Flora, Fauna, Population, Material Assets, Climatic Factors, Soil, Water	1, 6, 9, 10, 11, 15, 18
Achieve more effective geo-conservation and improve soil quality	SEA: Soil, Climatic Factors, Human Health, Water, Landscape; HIA	2, 3, 6, 7, 8, 9, 10, 15

Common theme	Relevance to SEA, HIA, EqIA and HRA	Relevance to draft IIA Objective
Improve air quality	SEA: Air, Climatic Factors, Human Health, Population, Material Assets; HIA, EqIA	4, 7, 8, 10, 22, 25, 17, 18
Minimise the adverse impacts of noise on people living and working in, and visiting the area	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 4, 5, 11, 15, 18
Social		
Improve health and well-being and promote greater levels of physical activity	SEA: Human Health, Population, Landscape; HIA; EqIA	1, 4, 7, 11, 13, 14, 15, 16, 17
To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be	SEA: Human Health, Population; HIA; EqIA	13, 14, 15, 16, 17
Maximise the contribution that the arts, culture and heritage can make to the community	SEA: Population, Material Assets, Cultural Heritage; HIA; EqIA	1, 12, 13
The need to ensure that new housing development meets local and regional needs (for all sections of society)	SEA: Population, Human Health, Material Assets; HIA; EqIA	1, 5, 13, 14, 15
Promote more sustainable transport choices and to improve accessibility	SEA: Population, Human Health, Material Assets, Air, Noise, Climatic Factors; HIA; EqIA	1, 2, 4, 7, 11, 15, 17
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	SEA: Population, Human Health, Landscape, Material Assets; HIA; EqIA	1, 6, 12, 13, 14, 15
Improve educational attainment and training opportunities	SEA: Population, Human Health; HIA; EqIA	13, 14, 15, 16, 17, 18
Reduce crime and fear of crime	SEA: Population, Human Health; HIA; EqIA	1, 4, 13, 14, 15, 16, 17, 18
Economic		
Promote sustainable economic development and a range of employment opportunities	SEA: Population, Human Health, Material Assets; HIA; EqIA	16, 17, 18

3.8 The Sustainability Baseline and Key Sustainability Issues

3.8.1 Introduction

Box 2 defines the SEA Directive requirements for this element of the process.

Box 2: SEA Directive Requirements for Baseline Data Collation

'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))

'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC'(Annex 1 (d)).

3.8.2 Methodology

Characterising the environmental and sustainability baseline, issues and context is an essential part of developing the IIA Framework. It comprises the following key elements:

- Characterising the current state of the environment within the Old Oak & Park Royal Development Corporation area including social and economic aspects; and
- Using this information to identify existing problems and opportunities that could be considered in the Local Plan.

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), ODPM guidance and NPPG, and the data available for London. This encompassed data relating to HRA. Data was also collated for additional socio-economic topic areas relating to HIA and EqIA including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered; and
- The results of the scoping workshop with stakeholders in July 2015.

The collation of baseline data also enabled the identification of key sustainability issues and opportunities affecting the area.

Appendix C summarises the key baseline trends across the area. Each section is subdivided to present the following:

- The baseline indicators that have been used (some are also contextual indicators and may not actually form part of the IIA Framework).
- Descriptive text, graphs and statistics about the County.
- Key data gaps.

Appendix C also provides a summary of how the identified key sustainability issues and opportunities might be addressed in the Local Plan. Sustainability issues and opportunities identified from the baseline review are summarised in **Table 3-3**.

3.8.3 Key Sustainability Issues and Opportunities

Table 3-4 presents a summary of the key sustainability issues and opportunities for OPDC.

Table 3-4 Key Sustainability Issues and Opportunities

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Population	• The current population of OPDC is considered to be low, consisting of 4,491 persons in 1,898 households. The dominant age group is 25 – 64 years old. Compared to the national average (16.3%), the area has a significantly lower ageing population percentage (aged 65+) of 6.1%. OPDC have been charged with delivering at least 24,000 new homes within the study area, which will see the population rise significantly compared to its current level. • After White British (21.6%), there are significant populations of Other White (18.6%) and Black (African/Caribbean and Other total 24%)). • There is an Irish Traveller community living within the study area. • A large transitory construction workforce could also have negative effects on the community.	• The influx of future population needs careful management to reduce inequalities throughout the area and adjoining boroughs. The Local Plan could seek to model the unknown future population, drawing on lessons learnt from other major development projects such as King's Cross. • Careful consideration should be given to the wider population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family. This provides opportunities for Lifetime Neighbourhoods and intergenerational mixed housing. • The provision of accessible services should meet existing and new local population growth needs. • The provision of social infrastructure needs for healthcare and key services due to a large future population needs to be prioritised, exploration of developing sites before threshold population numbers should be explored. • The Local Plan should consider the potential for the withdrawal of Permitted Development Rights for the conversion of offices to residential use, to prevent the reduction in community cohesion and access to facilities.	SEA: Population, Human Health HIA EqIA	1, 2, 4, 5, 13, 14, 15, 16
Education and Qualifications	• The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England. • There is a gap in education facilities within the area.	• Positive trends in the following should be expected: ○ Reducing the number of residents without a qualification; ○ Ensuring new population numbers have adequate educational facilities; ○ Ensuring that schools and other education facilities outside the OPDC area aren't adversely affected. • Opportunities to incorporate work based learning/training should be incorporated into the Local Plan where possible. These opportunities could also be linked to the colleges and universities within the surrounding area.	SEA: Population, Human Health, Material Assets HIA EqIA	13, 14, 15, 16

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Health	• 15.1% of the area's population stated they have limiting long-term illness or disability, higher than the London average. • Life expectancy for men is 2 years lower than the national average. • During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%. • There are pockets of health deprivation within the study area along with a very poor living environment. • Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital. • There is currently poor accessibility to district and Local Park sized open space/green infrastructure/play space.	• The rise of people who are in good health across the area and the continued reduction of those in poor health should be supported. • The scale of development means that new care facilities need to be delivered, not as standalone but as part of a combined approach to social infrastructure provision. • All new high streets need to obtain 10 out of 10 in the Healthy High Streets measure. • Construction phase impacts should be considered within the Local Plan, around timing of construction and the impact it has on local communities- including both psychological and physical effects. • Incoming population – there is an opportunity for the health of the local community to be built in to the Local Plan principles from the very beginning. This may include building in street networks, designed to support exercise and so that children can play independently; designing areas of multi-generational play; building in creativity, art, intrigue, surprise – to create a sense of place and a high quality environment; and designing housing and workspace that supports health and well-being. • The Local Plan should seek to ensure that accessibility to open spaces, including green spaces, as this can have benefits for both physical and mental health. • Design measures should be included within the Local Plan, that encourage a reduction in the need to travel by private car – this could include the provision of a mix of land uses; and the design of well-connected street networks at the human scale.	SEA: Population, Human Health, Material Assets HIA EqIA	1, 4, 7, 11, 13, 14, 15, 16
Crime	• The area is one of the more deprived areas of the country in relation to crime levels. Car theft is average or above average in the centre of the OPDC. Violence	• Given the proposed retention of Strategic Industrial Location (SIL) in Park Royal, the Local Plan should seek to ensure that the design of new development improves the safety and perceived safety of the community and their property.	SEA: Population, Human Health HIA	13, 14

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	against persons is also high or above average in the majority of the OPDC area.	• Secured by Design principles should be reflected in new development within the OPDC area alongside considering wider place-making aspirations.	EqIA	
Water	• Both the River Brent and Grand Union Canal are characterised by poor chemical and biological water quality. • The western boundary of the OPDC area is at risk of fluvial flooding from the River Brent. • There is an increased threat from surface water flooding due to increased precipitation rates generated by climate change. • There are risks associated with flooding and the mobilisation of contaminants linked to contaminated land within the area. • Counters Creek Combined Sewer is nearly at capacity. • In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.	• The risk of flooding and the mobilisation of contaminants should be prevented through measures such as a site-wide drainage strategy and increased awareness. Such measures could also reduce the risk of flooding. • The Local Plan should seek to ensure that there is sufficient infrastructural capacity for new development, ahead of occupation. • The Local Plan should seek to encourage increased efficiency in the use of water through design measures. • The Local Plan should seek to coordinate the implementation of flood mitigation measures with other public realm requirements including utilities and smart infrastructure.	SEA: Water, Population, Human Health, Soil, Climatic Factors, Landscape HIA EqIA	3, 6, 7, 9, 10, 15
Soils and Geology	• There are no areas of Regionally Important Geodiversity Sites (RIGS) within the area. • The area's heavy manufacturing history has left a legacy of land contamination which may give rise to number of development issues.	• The Local Plan should seek to protect the area's soils from contamination and continue to remediate areas that were impacted in the past. • The Local Plan should seek to support the decontamination of soil within the local area.	SEA: Soil, Biodiversity, Human Health, Water HIA	2, 3, 9, 10, 15
Air Quality	• The principal threat to clean air in London comes from road traffic. There are areas of high NO_2 concentrations in the along the strategic highway network. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.	• The Local Plan should ensure that impacts on air quality resulting from demolition and construction are minimised, specifically with regard to local communities. • The Local Plan should seek to ensure that any benefits generated to local air quality from a change in economic land	SEA: Air, Climatic Factors, Material Assets, Human Health	4, 7, 11, 15

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	• Air Quality Management Areas (AQMAs) are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of nitrogen dioxide (NO2)7 and particulate matter smaller than 10 micrometres (PM10)8. Each of the three boroughs have identified the same exceedances and types of pollutants. New types of development in the area may lead to an improvement in local air quality.	use are not counteracted by the increase in population and development overall.	HIA	

[7] Nitrogen dioxide (NO_2) is one of a group of gases called nitrogen oxides. Road transport is estimated to be responsible for about 50% of total emissions of nitrogen oxides, which means that nitrogen dioxide levels are highest close to busy roads and in large urban areas. Gas boilers in buildings are also a source of nitrogen oxides. There is good evidence that nitrogen is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and cough. Nitrogen dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals. http://www.londonair.org.uk/LondonAir/guide/WhatIsNO2.aspx

[8] Particles or particulate matter (PM) are tiny bits of solids or liquids suspended in the air. Particles originating from road traffic include carbon emissions from engines, small bits of metal and rubber from engine wear and braking as well as dust from road surfaces. Others include material from building and industry as well as wind-blown dust, sea salt, pollens and soil particles. Particles smaller than about 10 micrometres, referred to as PM_{10}, can settle in the airway and deep in the lungs and cause health problems. The health effects of particle air pollution have been widely studied, and include premature death and the worsening of heart and lung disease, often increasing admissions to hospital. http://www.londonair.org.uk/LondonAir/guide/WhatIsPM.aspx

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
Climate Change	• Energy consumption within the area was similar to the London average in 2009-11.	• Greenhouse gas emissions should be reduced at the rate, and exceeding where possible, required to meet local and national targets, helping to mitigate the impacts of climate change. • The reduction of energy use in the area should be encouraged both by existing developments and future ones. This might include the development of a site-wide decentralised energy generation and storage network and to create a closed loop system. • A high proportion of energy generated should be from low, zero or negative carbon energy sources.	SEA: Air, Climatic Factors, Material Assets, Human Health HIA	4, 6, 7, 11, 15
Biodiversity, Flora and Fauna	• There are no designated sites[9] within the OPDC boundary and no nationally/internationally designated sites (Sites of Special Scientific Interest (SSSI)/SPA/SAC/Ramsar) within 2km. • Richmond Park SAC is 6.9km to the south of the OPDC area and Wimbledon Common SAC is 8km to the south. • Wormwood Scrubs is a Local Nature Reserve and possesses a variety of wildlife. It is popular with birdwatchers and supports woodland, grassland and is home to common lizards and at least 20 species of butterfly. • The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance.	• The Local Plan should seek to ensure that impacts to designations, species and habitats is minimised as well as seeking to encourage increased biodiversity within the area. • Opportunities should be sought to ensure that protected species have favourable conservation status and are thriving. • Opportunities should be sought to promote habitat connectivity both within the area and outside of it. The layout of connected habitats and a wider green infrastructure scheme of walking and cycling routes could form the basis for the spatial planning of the OPDC area. • Wormwood Scrubs Local Nature Reserve's and the Grand Union Canal's habitat and species should be protected and enhanced.	SEA: Biodiversity, Flora, Fauna, Population, Soil, Water, Air, Climatic Factors, Landscape HIA	1, 9, 10, 11, 12, 15, 18

[9] Nature sites and areas of countryside can be 'designated', which means they have special status as protected areas because of their natural and cultural importance. There are restrictions on activities and developments that might affect a designated or protected area, e.g. building new houses or roads. This includes areas next to as well as in those areas. (https://www.gov.uk/check-your-business-protected-area)

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	• There is potential for impacts to protected species as a result of an increasing population and the resulting development required to meet population needs.			
Cultural Heritage assets	• There are a number of undesignated heritage assets in the area. • There is the potential for undiscovered archaeological remains to exist throughout the area. • There is one listed asset within the OPDC area – Brent Viaduct. • Within the boundary there are three Conservation Areas, these are: Cumberland Park Factory, Old Oak Lane; and along the Grand Union Canal. • The plan area includes a proposed conservation area on the east side of Scrubs Lane. • Adjacent to the study area are the St. Mary's Conservation Area in Hammersmith and Fulham, which includes the St Mary's Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea incudes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments). • Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area: ○ Harlseden; ○ Old Oak and Wormholt;	• The Local Plan should ensure that both designated and undesignated or undiscovered heritage assets and their settings, and archaeological remains are protected and, where appropriate, enhanced. • Cultural heritage assets throughout the OPDC area could provide an opportunity for tourism and leisure. Opportunities should be sought to safeguard and promote awareness of the important heritage assets and their settings within the OPDC area – particularly in relation to the area's role in industry and during the interwar period. • Cultural heritage assets could also provide an opportunity to enhance the area environmentally, socially, as well as economically. This should be considered throughout the development of the Local Plan, with assets being enhanced and conserved for future use. • Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed. • OPDC could explore the potential for the production of a Local List of locally significant heritage assets, to be considered as part of the planning process. • With the Mayor's support Historic England has recently consulted upon and is now finalising guidance for the comprehensive review programme for London's Archaeological Priority Areas. A desk-based appraisal should be undertaken by OPDC to identify areas of known or potential archaeological interest meriting identification as new priority areas.	SEA: Population, Material Assets, Cultural Heritage, Landscape	1, 5, 12, 13, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	○ Hangerhill Garden Estate; and ○ Hagerhill (Hay Mills) Estate. Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station. • The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. • A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case. • Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest	• There could be potential impact on the setting and significance of heritage assets from taller buildings.		

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	if subject to redevelopment. They provide opportunity for retaining and enhancing character and distinctiveness.			
Landscape and Townscape	• The eastern boundary of the plan area is formed by St Mary's Cemetery, which forms a continuous landscape with the grade I historic park of Kensal Green Cemetery. • The OPDC area comprises a largely industrial townscape with its edges influenced by more residential areas and strategic roads. Railway infrastructure is a dominant feature across the site. • Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. • While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency.	• Opportunities could be sought to maintain the important heritage of Old Oak in particular and OPDC more widely. • Access to and awareness of the unique aspects of the area should be improved. • The development of the area should enhance adjoining landscapes situated on the OPDC boundary and vice versa. • Integration with the All London Green Grid Area SPG Frameworks is an important consideration. • It is essential that townscape character and quality is maintained/enhanced through high quality design, careful siting of tall buildings, and incorporation of soft landscaping. • There could be potential impact on the landscape and townscape from the deposition of buildings, in particular, taller ones as they may visually impair on the landscape and block views.	SEA: Landscape, Material Assets, Cultural Heritage	1, 2, 5, 6, 8, 10, 11, 12, 13, 14, 15, 18
Waste	• Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012. There is currently no data available on the municipal waste sent to landfill in the area. • There are several waste sites within the area: European Metal Recycling; Powerday; Capital Waste Ltd; UK Tyre Exporters; O'Donovan's Waste Disposal Ltd.	• Opportunities should be sought to continue the reduction in waste being sent to landfill. • There is an opportunity for the OPDC area to become an exemplar centre for the creation of an 'integrated circular economy'. This could include the creation, use and recycling of products locally, including the potential for the growing of local food through the use of vertical farms. • The Local Plan should seek to increase rates of recycling, reuse and composting of waste, which would otherwise be sent to landfill. • The Local Plan should explore the delivery of innovative waste transport and management techniques supported by smart city technology.	SEA: Population, Human Health Material Assets, Soil, Air, Landscape, Climatic Factors HIA EqIA	2, 3, 6, 7, 8, 9, 10, 11, 15, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		• Due to potential land use changes, there's a need to consider waste apportionment with the neighbouring boroughs and where waste will be processed if these uses are displaced by new development.		
Transportation	• Old Oak and Park Royal are poorly connected to the wider road network. • Both Old Oak and Park Royal generate significant numbers of road freight movements. • Access to and from Old Oak station is currently poor. • There are a number of 'hard edges' along the boundary of the OPDC area, which creates poor legibility for walkers and cyclists. • Roads in Park Royal are congested.	• Opportunities should be sought to maximise modal shift towards sustainable transport modes, in particular, walking and cycling. • Opportunities should be sought that maximises rail transport of both goods and people. • The Local Plan should seek to ensure that improvements in the area do not lead to increase pollution/traffic etc., elsewhere across London. • Opportunities should be sought that maximises opportunity for green networks and improves connectivity for people across the area. • Green Infrastructure – there is an opportunity to create green infrastructure which facilitates live/work/play/travel through as well as fast and meandering routes. However, the Local Plan should manage the spread of routes across the OPDC area, so that certain routes do not become congested. • The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area. However, capacity issues should be taken into consideration. • There is an opportunity to significantly improve accessibility to and throughout the site, including the creation of legible routes and reducing 'hard edges'. The Local Plan should consider alternatives to the use of on-street parking and servicing at the fronts of buildings, as these can have a negative effect on the 'street atmosphere'.	SEA: Population, Human Health, Air, Climatic Factors, Material Assets HIA EqIA	1, 4, 6, 7, 11, 13, 14, 15, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
		• Opportunities should be sought to reduce motorised transport and increase the use of greener, smarter, more sustainable modes of transport. • Opportunities should be sought to develop road infrastructure that supports economic growth. During construction in particular, the Local Plan should consider the limitations of the road network and the potential impact from construction on existing businesses that are reliant on the existing road network and local communities.		
Noise	• Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads.	• The Local Plan should seek to minimise the effects from noise pollution on the existing and incoming population, and ensure that these effects do not disproportionately affect any particular socio-economic or equalities group.	SEA: Human Health, Population HIA EqIA	1, 2, 4, 11, 12, 15, 18
Local Economy	• The area is characterised by some 2,000 businesses – the majority (75%) of these are micro in scale. The OPDC area suffers from employment deprivation. There's a strong element of warehousing and other light to heavy industrial uses. A large proportion of residents within the area work locally. The displacement of existing businesses in the area could lead to a negative effect on the existing community. • Affordable workspace – much of the available workspace is affordable at present, due to its poor quality. There is also an issue relating to density in this area – warehousing uses are low employment generators. • 18.6% of the population have been claiming job seekers allowance for more than a year. • There are inequalities between men and women. • Infrastructure/Utilities – a key issue for the area is how infrastructure/utilities will be improved to accommodate	• Employment and training - There is an opportunity for the Local Plan to specify that a proportion of incoming employment opportunities are to be directed towards local people in the existing and surrounding communities. This combines with an opportunity to upskill the local workforce, the majority of whom may currently be in lower-skilled jobs in the local area. • The Local Plan should seek to provide employment and business opportunities that meet the current and future needs of the local and regional economy, within the context of the neighbouring communities. • The Local Plan should seek to ensure that the appropriate infrastructure capacity is developed and planned comprehensively, ahead of the occupation of new development. • A fine balance between place-making, providing enough facilities, and not destroying external town centres, needs to be sought. Improved connectivity from the OPDC area to the	SEA: Population, Human Health, Material Assets HIA EqIA	1, 2, 3, 15, 16, 17, 18

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	the new development. In particular, broadband capacity is very poor at present within Park Royal. Also transport links need significant improvement. • Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would destroy neighbouring town centres, including Ealing town centre.	town centres could be beneficial in this respect. Harlesden town centre would be walkable from the OPDC area. • Healthy New Towns – NHS England are seeking to promote this initiative in the OPDC area. This is based on health-led employment in the centre, for clean, green and healthy technology businesses. This may include research companies etc. • North Acton is seeking to attract a university campus in the OPDC area, which would buffer the industrial area further north, with an area of student housing further south. Anecdotal evidence suggests that the campus may be associated with Imperial College. • Town centres – there is a potential issue that the development of offices and retail facilities within the OPDC area would negatively impact on neighbouring town centres, including Harlesden town centre, if not appropriately managed. • The land uses in the OPDC area are likely to experience a wholesale change from the existing situation. This could provide an opportunity to reduce disparities across the area.		
Deprivation and Living Environment	• The area lies within other deprived areas of Brent, Ealing and Hammersmith & Fulham and falls within the most deprived areas for living environments.	• Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements in the OPDC area that deliver employment opportunities, high quality new housing, improved public realm, and access to nature, would all provide benefits towards reducing deprivation.	SEA: Population, Human Health HIA EqIA	1, 4, 5, 6, 8, 9, 11, 12, 13, 14, 15, 16, 17
Housing	• 38.3% of the population in the OPDC area rent accommodation from private landlords, which is a rate that is significantly higher than adjoining boroughs. • 29.5% of households are owner-occupiers, compared to 42.9% in Brent, 34% in Hammersmith & Fulham and 51.1% in Ealing.	• Opportunities should be sought to provide housing that meets London-wide and local needs including the provision of affordable, low cost market, student and special needs housing. • The Local Plan should seek to lift more LSOAs out of the bottom 10% for housing deprivation.	SEA: Population, Human Health HIA EqIA	1, 5, 11, 13, 14, 15

Topic	Key Issue	Implications/Opportunities for the Local Plan	Relevance to SEA, HIA, EqIA and HRA	Relevant Draft IIA Objective
	• There is a shortage in the amount of affordable housing provided and there is a continuing need for affordable housing in the area and in London overall. • There is a Traveller site next to Old Oak on Backley Road, which is linear against the railway line and a metal refinery. • 9% of households in the plan area are lone parent families and over 90% of these parents are women. Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.			

3.8.4 Cross-boundary considerations

The OPDC area sits within the context of three London boroughs (Ealing, Brent and Hammersmith & Fulham) with the Royal Borough of Kensington and Chelsea to the east. As such, it has a role to ensure that the scale of development proposed for the area is with an understanding of the pressures faced by those boroughs and by London as a whole. The area is bounded by major roads such as the A40, connectivity from south to north is poor – specifically with regard to walking and cycling connections into Park Royal, south to White City and east to Kensal Canal side. Care should therefore be taken when considering future development to ensure that the impacts felt by adjoining boroughs isn't too disruptive either during construction or post-construction phases (e.g. construction traffic when coupled with existing business traffic). However, equally this creates an opportunity to encourage inward investment which the boroughs could benefit from.

The area and the remit of the OPDC presents a unique opportunity to incorporate the site area's heritage within its future development plans. Further, on its boundary, lies the St Mary's, Kensal Green Cemetery (Grade I registered park and garden of special historic interest), which contains a Grade I listed chapel, twelve Grade II* listed buildings/monuments and 147 Grade II listed buildings/monuments. Views from this into area and vice versa need to be adequately considered and protected throughout the development of the OPDC area. It is important to understand the impacts on the setting and significance on Kensal Green Cemetery from tall buildings within the Old Oak area. This will require careful analysis and management.

The quantum and change of development types needs to be carefully managed to ensure that existing businesses are still able to remain open both within the area and outside of it. As the area develops, it will be important to consider how nearby town centres, such as Harlesden and Ealing, will be affected by the scale of change proposed.

The OPDC area suffers from high levels of living environment deprivation. There is poor connectivity within the site as well as out into the wider surroundings. The redevelopment of the area should seek to improve open space provision all around the area in addition to improving connections to Wormwood Scrubs from all surrounding areas as well as enable green infrastructure and services that could be used by residents and non-residents of the area alike.

There needs to be careful consideration of the future in-migration into the OPDC area to ensure existing and future communities deliver sustainable communities. There should be a concerted effort to reduce inequality.

3.9 The IIA Framework

3.9.1 Background to the IIA Framework

The IIA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The IIA Objectives are separate from the objectives of the Local Plan, although there may be some overlaps between them. To help measure the performance of the Local Plan's components against the IIA Objectives, it is beneficial if they are supported by a series of indicators. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the OPDC area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following section provides further details about the development of the IIA Framework.

3.9.2 Development of the IIA Objectives

The IIA Framework has been developed using the IIA Framework from the Draft OAPF IIA (February 2015)[10] as a base. This was analysed and refined, using the following:

- Comparison against the updated PPPs and identified key sustainability issues and opportunities;

[10] https://www.london.gov.uk/sites/default/files/OOPR%20OAPF%20draft%20IIA%20Report.pdf

- Comparison against the SAs developed for the Local Plans for:
  - Brent;
  - Ealing;
  - Hammersmith and Fulham;
- Assessment against the requirements of the NHS London Health Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool Framework (January 2013);
- Comparison with the 'Equality Framework' included in the Mayor of London's 'Equal Life Chances for All' Policy Statement (July 2009);
- Findings from the IIA Workshop; and
- Consultation Comments on the Scoping Report (September 2015)

Table 3-5 presents the IIA objectives that have been used in the assessment of the Regulation 19(2) Second Revised Draft Local Plan. Each of the IIA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. However, it is noted that the objectives are not mutually exclusive and the assessment framework should be considered in its entirety. As such, the IIA Objectives are not presented in any particular order, with all objectives being considered as having equal weighting. The IIA Objectives are included in **Table 3-5** below.

Where possible, IIA Objectives are also supported by indicators. The indicators selected link to those used to describe the baseline conditions across the area, as an understanding of the existing conditions is needed to inform the assessment. Where baseline data is not currently available, indicators have been suggested as to the type of information that may be appropriate. Throughout the course of the IIA, quantified targets will be identified where possible to supplement this framework in liaison with OPDC. Any further requirements for indicators are identified in the Draft SA Monitoring Framework.

Table 3-5 IIA Framework

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
1	**To enhance the built environment and encourage 'place-making'** • Optimise development opportunities to develop and enhance local distinctiveness and character • Ensure new buildings and public spaces are appropriately designed and constructed including enabling the creation of safe and welcoming spaces and access for all • Create new, accessible and managed open spaces- public, communal, private and children's play space, public realm and spaces where children can play independently, which reflect the needs of the community. • Maximise the contribution that the arts, culture and heritage can make to a community including building creativity, art, intrigue, character and surprise into the built environment • Increase in the legibility of public spaces and increase walking and cycling routes within and adjacent to Old Oak and Park Royal • Encourage the use of contemporary technology in the public realm to support design, delivery and management • Encourage adherence to the principles of Lifetime Neighbourhoods • Maximise delivery of active frontages in appropriate locations Link to objectives 12 (heritage), 5 (housing); 13 (community cohesion); 14 (crime and fear of crime); 15 (health and wellbeing)	• *Provision of publicly accessible open space in accordance with the London Plan Categorisation[11]:* ○ Regional Parks (400ha): 3.2 to 8km from homes; ○ Metropolitan Parks (60ha): 3.2km from homes; ○ District Parks (20ha): 1.2km from homes; ○ Local Parks and Open Spaces (2ha): 400m from homes; ○ Small Open Spaces (under 2ha): less than 400m from homes; ○ Pocket Parks (under 0.4ha): less than 400m from homes; ○ Linear Open Spaces (Variable): wherever feasible. • *Proportion of accessible open spaces created which have a long term management and funding plan.* • *Integration with the All London Green Grid Area Frameworks* • *Number of new buildings and public spaces designed to be inclusive* • *Proportion of new development incorporating an appropriate level of open space for recreation* • *Legibility and quality of the pedestrian and cycle environment* • *Proportion of new development incorporating Lifetime Neighbourhoods principles*	SEA: Population, Human Health, Material Assets, Cultural Heritage, Landscape HIA EqIA

[11] https://www.london.gov.uk/sites/default/files/ALGG_SPG_Mar2012.pdf

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
		• *Proportion of people who are happy with their local environment as a place to live* • *Proportion of new development using technology to improve legibility*	
2	**To optimise the efficient use of land through increased development densities and building heights, where appropriate** • Optimise housing density in a way that makes the most efficient use of land whilst meeting housing needs • Optimise development density in a way that makes the most efficient use of land whilst meeting commercial needs and responding to sensitive areas Link to objectives 7 (natural resources use); and 8 (waste)	• *Housing density in comparison to neighbourhood quality* • *Density of commercial development in comparison to existing (2015) levels*	SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets HIA
3	**Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land** • Increase accessibility to household and commercial sustainable waste management facilities • Improve soil quality and achieve more effective geoconservation where appropriate • Contribute to a scheme of strategic land remediation Link to objectives 4 (natural resources use); 6 (waste); and 12 (reuse of existing buildings)	• <u>Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles)</u> • *Quality of soil resources* • *Materials balance as a result of construction activities* • *Development and implementation of a strategic land remediation scheme* • *Amount of soil remediated on site*	SEA: Population, Human Health, Biodiversity, Soil, Water, Landscape, Material Assets HIA
4	**Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network** • Increase the co-location of services and facilities, in accessible locations by walking, cycling and public transport	• <u>Distribution of major transport systems – roads, rail links</u> • *Modal shift of existing travel patterns verses future travel patterns* • *Connectivity of the cycling and walking network* • *Km of designated cycling and walking routes*	SEA: Population, Human Health, Air, Climatic Factors, Material Assets, Landscape HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	• Increase the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal • Prioritise walking and cycling over other forms of transport • Increases the opportunity for the transport of goods and people by rail transport • Consider the impact of construction on local infrastructure on local businesses and communities • Support the testing and implementation of future transport modes • Mitigate the impact of construction traffic • Maximise the accessibility of stations Link to objectives 7 (climate change); 11 (pollution); and 14 (safety)	• *Proportion of goods arriving and leaving the area by rail in comparison to road* • *Proportion of waste and freight arriving and leading the area by canal.* • *Proportion of shared spaces within the urban environment* • *Controlled parking zones, car clubs and travel plan measures implemented* • *Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009)* • *Number of local businesses negatively affected by construction activities* • *Increase in traffic on the highway network in and around the OPDC area*	
5	**Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local and regional needs** • Provision of adaptable homes for independent living for older and disabled people • Provision of innovative housing typologies to meet needs • Provision of homes to need the needs of older people including extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes • Provision of housing suitable for family accommodation including single-parent families • Increase in use of high quality design including meeting energy efficiency standards • Provision of facilities to meet identified needs of Gypsies, Travellers and Travelling Show people	• Dwelling Stock (Office for National Statistics Local Profiles). • *Household density (Office for National Statistics Local Profiles)* • *Proportion of LSOAs in the bottom 10% for housing deprivation* • *Proportion of dwellings meeting all of the health and wellbeing credits in the Code for Sustainable Homes* • *Proportion of dwellings that meet internal space standards* • *Proportion of dwellings with a high SAP rating* • *Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009)* • *Amount of family size housing (source: Equal Life Chances for All 2009)*	SEA: Population, Human Health, Climatic Factors, Material Assets HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	• Ensure all new homes meet Lifetime Homes standards Link to objectives 1 and 6 (sustainable design); 13 (community cohesion and social exclusion); 14 (secured by design); 15 (health)	• *Proportion of single parent families living in unsuitable accommodation* • *Amount of affordable housing (source: Equal Life Chances for All 2009)* • *Amount of Lifetime Homes (source: Equal Life Chances for All 2009)* • *Proportion of market, affordable and specialist housing delivered.*	
6	**Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect** • Minimise the proportion of new development at risk of flooding from all sources including surface water, groundwater and reservoir flooding • Minimise the increase in risk of flooding elsewhere • Increase the use of sustainable design including Sustainable Urban Drainage, natural ventilation and shading for temperature adaptation Link to objectives 10 (habitat connectivity); 7 (energy efficiency); 12 (sustainable adaptation and reuse of existing buildings)	• River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009). • Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map) • Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map) • *Proportion of energy usage in buildings using sustainable design compared with standard construction*	SEA: Biodiversity, Human Health, Water, Air, Climatic Factors, Material Assets, Landscape HIA EqIA
7	**To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy** • Enable the area to be more self-sufficient in terms of energy generation and storage • Increase the proportion of energy generated from low, zero or negative carbon energy sources, through consideration of measures from the outset • Increase the proportion of journeys made by non-motorised transport • Increase the use of sustainable design to minimise the resource requirements and outputs of new development	• Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles) • All energy consumption by sector (Office for National Statistics Local Profiles and DECC) • *Energy consumption per capita* • *Proportion of properties generating energy from low or zero carbon sources, including solar.* • *Proportion of new developments incorporating district heating or heat pumps*	SEA: Population, Human Health, Air, Climatic Factors, Material Assets HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 4 (minimise the need to travel); 7 (sustainable design); and 12 (sustainable adaptation and reuse of existing buildings)	• *Greenhouse gas emissions per capita compared with London and national averages* • *Proportion of journeys made by non-motorised transport* • *Proportion of energy generated from low, zero or negative carbon energy sources*	
8	**To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste** • Promote the creation of a circular economy for the management of waste • Increase the use of recycled materials for the construction of buildings and infrastructure • Address the displacement of waste management to other areas • Enable the sustainable management of contaminated soils and hazardous waste • Increase accessibility to household and commercial sustainable waste management facilities • Maximise use of innovative waste collection and waste management techniques including smart technology Link to objectives 7 (resources use); 2 (efficient use of land); 3 (remediation)	• Number of active / historic landfills on the site (Environment Agency) • Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles) • Amount of residual waste per household (ONS) sent to landfill or incineration • Amount of commercial and industrial waste produced (Defra) • Amount of waste recycled and re-used within the area • Amount of waste transported within the area	SEA: Biodiversity, Population, Human Health, Soil, Water, Climatic Factors, Material Assets, Landscape HIA EqIA
9	**Improve the quality of the water environment** • Promote the improved efficiency in the use of water domestically and commercially • Promote the improved quality of local watercourses • Prevent the risk posed to the water environment from the run-off of contaminants • Ensure that infrastructural capacity is sufficient to accommodate new development ahead of occupation	• Water and groundwater quality (Environment Agency) • *Development of a site wide drainage strategy* • *Water consumption per capita* • *Increase in infrastructural capacity as a proportion of new development* • *Increased use of existing infrastructure*	SEA: Water, Human Health, Soil, Landscape HIA

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	Link to objectives 1 (biodiversity); 3 (climate change adaptation); 4 (climate change contributions); 5 (pollution); 7 (remediation); and 12 (Grand Union Canal)		
10	**Create and enhance biodiversity and the diversity of habitats across the area and its surroundings** • Conserve or enhance existing biodiversity across the plan area, including on brownfield sites • Increase the connectivity of habitats across the area and its surroundings • Create new areas dedicated to nature conservation • Seek to reduce the potential wide ranging impacts on international sites Link to objectives 3 (remediation); 6 (climate change adaptation); 9 (water environment); 11 (pollution); and 12 (Grand Union Canal)	• Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). • Key Biodiversity Action Plan (BAP) species and habitats present (London BAP) • *Protected species with favourable conservation status* • *Habitat connectivity* • *Condition of Wormwood Scrubs Local Nature Reserve* • *Condition of Grand Union Canal area of nature conservation* • *Increase in areas of greenspace for biodiversity including inaccessible areas*	SEA: Biodiversity, Flora, Fauna HRA
11	**To minimise air, noise and light pollution, particularly for communities and vulnerable groups** • Minimise noise pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities through the use of mitigation measures and the locating of future sensitive users away from pollution generators • Minimise air pollution caused by traffic and commercial uses during the construction and operation of development on existing and future communities,	• Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive[12]) • *Number of new local air quality monitoring points* • *Ill health attributed to air, noise or light pollution* • *Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group*	SEA: Population, Human Health, Air, Material Assets HIA EqIA

[12] http://uk-air.defra.gov.uk/aqma/maps

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	through the use of mitigation measures and the locating of future sensitive users away from pollution generators • Ensure that new waste management facilities do not negatively impact on sensitive uses including existing and future homes, and building occupants. • Reduce emissions from construction and demolition sites • Minimise light pollution Link to objectives 4 (sustainable transport); 7 (climate change); 15 (health)	• *Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group* • *Proportion of population living within areas with regular exceedances in NOx and particulates*	
12	**To conserve and enhance the historic environment, heritage assets and their settings** • Promote the historical interpretation of heritage assets, including the canal, through the use of multifunctional green infrastructure • Minimise heritage assets lost to new development to designated and undesignated assets. • Avoid adverse impacts on the setting of heritage assets, including those outside the OPDC area • Maximise the reuse and adaptation of heritage assets for place-making and minimising the embedded carbon in new development • Enhance local views and landscapes • Reduce the number of Heritage Assets at Risk in and around the area • Reduce impacts on heritage assets and their settings in areas adjacent to the plan area • Enhance areas of greenspace in connection with areas of importance for heritage protection Link to objectives 1 (place-making), 3 (reuse of existing buildings), 6 (energy efficiency), 7 (energy generation and sustainable design), 8 (use of recycled materials) and 18 (encourage inward investment).	• <u>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk).</u> • *Decrease in the number of Heritage Assets at Risk in and around the area* • *Increase in the number of heritage assets identified and protected through the development of Local List* • *Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation* • *Development of a local views strategy and proportion of new developments adhering to its principles* • *Increase in the number of heritage assets re-used for development*	SEA: Cultural Heritage, Material Assets, Biodiversity, Climatic Factors, Landscape HIA

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
13	**Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare** • Improve the quality of the public realm and increase the provision, accessibility and quality of public open spaces including play spaces • To increase connectivity and avoid physical barriers and severance across the area through measures including green infrastructure, creating physical and social linkages with the surrounding communities • Manage the construction process to reduce the impact of a potentially large transitory construction workforce on the local community, specifically in relation to social infrastructure and housing provision Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 14 (crime and fear of crime); 15 (health)	• *Number of offices converted to residential under permitted development rights* • *Schemes to reduce the impact of construction on the local community* • *Connectivity of pedestrian linkages across the area*	SEA: Population, Human Health, Climatic Factors, Landscape, Material Assets HIA EqIA
14	**Improve safety and reduce crime and the fear of crime** • Increase natural surveillance and other measures to design out crime • Encourage increased safety through the use of traffic management and calming methods Link to objectives 1 (place-making); 4 (sustainable transport); 5 (housing); 13 (community cohesion); 15 (health)	• <u>Crime rates (Indices of Deprivation)</u> • *Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009)* • *Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009)* • *Percentage of the local population who feel personal safety on buses, tubes and trains (source: Equal Life Chances for All 2009)* • *Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009)* • *Proportion of developments incorporating Secured by Design principles*	SEA: Population, Human Health, Material Assets HIA EqIA
15	**Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living**	• <u>Health Deprivation and Disability (Indices of Deprivation for England 2010)</u>	SEA: Population, Human Health,

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	• Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities • Increase the capacity of local social infrastructure • Encouragement of opportunities for buildings with a shared community use and the co-location of services • Facilitate the supply of local food through the provision of space for uses such as allotments or farmers markets • Reduce the potential for an over-concentration of hot food takeaways in the local area • Minimise construction phase impacts on communities, in relation to both physical and psychological health Link to objectives 1 (place-making); 4 (accessibility); 5 (housing); 13 (social and economic wellbeing)	• *Proportion of the population living within walking distance of health care facilities (see **Table 3-5**)* • *Proportion of the population living within walking distance of education facilities (see **Table 3-5**)* • *Proportion of the population living within walking distance of social care facilities (see **Table 3-5**)* • *Proportion of the population living within walking distance of community facilities (see **Table 3-5**)* • *Proportion of the population with access to space for the growing of food locally* • *Increase in the capacity of local social infrastructure* • *Childhood obesity rates* • *Life expectancy*	Material Assets, Soil, Air, Water, Landscape HIA EqIA
16	**To improve the education and skills levels of all members of the population, particularly vulnerable groups** • Increase in the availability of formal education across all age groups, including adults from all equality groups • Increase in the availability of informal education and training for all Link to objectives 4 (accessibility); 13 (community cohesion); 15 (health and wellbeing); 117 (social and economic wellbeing); 18 (sustainable economic growth)	• Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles). • Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). • Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). • *Proportion of the population with access to appropriate education facilities by sustainable transport modes* • *Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)*	SEA: Population Human Health, Material Assets HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: underlined; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
17	**Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training** • Provision of access to a range of high quality local employment opportunities, a proportion of which will be directed towards local people, both during construction and permanent jobs, including those from disadvantaged groups • Encourage workforces to reflect local and regional diversity in all occupations and at all levels • Provision of access to a range of work-based and other training opportunities, a proportion of which will be directed towards local people, including those from disadvantaged groups • Provision of a range of accessible retail stores, including food stores and smaller affordable shops for social enterprises • Increase in the provision of facilities for childcare • Encouragement of employer's to adopt the London Living Wage Link to objectives 15 (health and wellbeing); 116 (education and training) and 18 (sustainable economic growth)	• Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010) • *Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements* • *Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements* • *Employment rate by excluded group compared to employment rate of all Londoners (source: Equal Life Chances for All 2009)* • *Workforce profile at all levels (source: Equal Life Chances for All 2009)* • *Proportion of the community living within walking distance of a local shop (see **Table 3-5**)* • *Levels of Child Poverty (source: Equal Life Chances for All 2009)* • *Number of childcare places (source: Equal Life Chances for All 2009)* • *Take-up of subsidised childcare places (including those for disabled children) benchmarked against the LDA Childcare Affordability Programme (source: Equal Life Chances for All 2009)*	SEA: Population, Human Health, Material Assets HIA EqIA
18	**To encourage inward investment alongside investment within existing communities, to create sustainable economic growth** • Increase in the net number of businesses registered in the area • Increase infrastructure and utilities capacity, including broadband connections	• Economy Local Profiles (ONS) • Employment by industry (ONS- NOMIS) • *Proportionate coverage of broadband across the area* • *Proportion of new employment development that includes an element of affordable workspace*	SEA: Population, Human Health, Material Assets HIA EqIA

	IIA Objective and sub-objectives	Indicators (known indicators: <u>underlined</u>; proposed indicators: *italics*)	Relevance to SEA, HIA, EqIA, HRA
	• Ensure workspace meets the needs of new and emerging businesses, including affordable, flexible and micro/SME workspace • Deliver retail that does not negatively impact on neighbouring town centres • Encourage the development of employment growth sectors including clean, green and healthy businesses • Support the relocation of business from Old Oak to Park Royal. • Intensify the use of workspaces within Park Royal Link to objectives 16 (education and training) and 17 (social and economic wellbeing).	• *New businesses categorised as 'health-led'* • *New businesses that contribute to the growth of the low carbon goods and services sector* • *Amount of new employment floorspace in Old Oak* • *Amount of new industrial floorspace in Park Royal*	

3.10 Assessment Methodology

The appraisal will be presented in an appraisal matrix for each group of policies, clusters and allocations. The matrix is an established method for clearly analysing the performance of the policies or sites and helps meet the requirements of the SEA Regulations by ensuring that the following elements are considered. This will enable significant effects to be identified:

- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
- Temporal scale – whether the impact will be short-term (within 0-5 years of Local Plan implementation), occur in the medium term (within 5 – 10 years of Local Plan implementation) or occur in the long-term (10 – 25 years of Local Plan implementation).
- Spatial scale – where the impacts will occur within the area. Any transboundary effects outside of the study area would also be considered.
- Permanency – whether effects will be permanent or temporary.
- Level of certainty – the level of certainty in the prediction will be classified as low, medium or high.
- Cumulative and synergistic effects.

Where negative impacts are identified, measures will be proposed to offset, avoid or otherwise mitigate for the impact. In addition, measures which may further enhance benefits will also be identified as appropriate.

Tables 3-7 and **3-8** provide an explanation of the notation to be used on the assessment matrices.

Table 3-7 Assessment Scale

Major Positive Impact (significant)	The option strongly supports the achievement of the IIA Objectives	++
Positive Impact	This option contributions partially to the achievement of the IIA Objective	+
Neutral/No Impact	There is no clear relationship between the option and/or the achievement of the IIA Objective	0
Positive and negative outcomes	The option has a combination of both positive and negative contributions to the achievement of the IIA Objective.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	-
Major Negative Impact (significant)	The policy strongly detracts from the achievement of the SA Objective.	- -

Table 3-8 – Notation used to identify types of effects

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.
I	Indirect effects.

R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction

4 Stage B: Developing and Refining Options and Assessing Effects

4.1 Alternatives

As identified in Box 3, the SEA Directive requires that the assessment process considers alternatives:

Box 3: Consideration of Alternatives

> *'..an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated' (2001/42/EC) (Article 5.1).*

Government guidance advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects. SEA can encourage further thinking around alternatives~~,~~ and highlight where environmentally preferable options exist. If there are genuinely no reasonable alternatives to a plan, alternatives should not be artificially generated. This Draft IIA Report presents the assessment of the strategic plan policies that have been developed following the conclusion of the Regulation ~~18~~ 19 Draft Local Plan and assessed as part of the Regulation 19 (2) Second Revised Draft Local Plan.

4.2 Assessment of the Spatial Vision and Narrative

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the IIA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Spatial Vision for OPDC has been reviewed against the IIA Objectives, and a summary of the key strengths, weaknesses and recommendations are presented in **Chapter 5**. Recommendations were made to offset or alleviate any adverse impacts that were predicted, or to enhance any opportunities that were identified. ~~The~~ Changes were made to the Spatial Vision ~~has changed~~ between the Regulation 18 and Regulation 19 Draft Local Plans, with the Spatial Narratives providing more context to how existing development can harmoniously work alongside the new to benefit local communities as well as how the OPDC area fits into the wider London setting. No further key changes were made to the Spatial Vision as a result of the Regulation 19(1) consultation outcome.

4.3 Assessment of the Strategic Options

Good practice guidance also recommends that the goals of a plan should be assessed against the SA Objectives. The assessment of the Strategic Options of the Local Plan against the SA Objectives has been undertaken using a simple matrix-based approach. **Chapter 5** presents the complete compatibility against the SA Objectives and is contained in **Appendix E**. The Strategic Options were first assessed at the Regulation 18 stage and dealt with the options available to the OPDC around affordable housing policies.

4.4 Appraisal of Preferred Policies and Policy Options

The preferred policies were assessed against the IIA Objectives using a matrix based approach. This identified the positive and negative impacts associated with the policies and included mitigation measures to address any predicted adverse impacts. As there is a degree of overlap between the intentions of some of the policies they have been grouped together and the groups of policies, for example, all those relating to Design have been assessed in a single matrix.

The Places policies have been assessed alongside their Cluster policies and any identified Site Allocations provided.

The assessment notations used in the assessment, together with their definition (i.e. how a positive score was assigned) are presented in **Chapter 3** and **Appendix D**. When undertaking the assessment, the symbols assigned in the matrix were justified in the commentary box along with any uncertainties.

A summary of the assessment of the appraisal of the Preferred Policies is provided in **Chapter 7**. The complete results of the assessment are presented in **Appendix D**. An appraisal was previously undertaken in 2017, the Draft Local Plan was then amended in light of this and this IIA Report has now been updated with track changes to reflect the latest version of the Plan. The next two chapters represent the latest results of the appraisal and also summarise the key areas of difference between the latest version and the previous version of the Draft Local Plan.

4.5 Mitigation

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix ~~C~~ D are italicised for clarity.

As the Regulation 19(2) Second Revised Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan.

4.6 Appraisal of Cumulative and Synergistic Effects

The SEA Directive requires, *inter alia,* that cumulative effects should be considered. It stipulates the consideration of *"the likely significant effects on the environment…"* and that *"these effects should include secondary, cumulative, synergistic…effects"* (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the Local Plan has been inherently considered within the appraisal, the findings of which are presented in Chapter 7.

4.7 Appraisal of Cross-boundary Issues

The SEA Directive requires SAs to consider the cross-boundary issues for closely neighbouring authorities. Key issues include that there is not enough affordable housing in London to meet the current and future demand, surface water flood risk, employment and economic activity rates and the lack of open space. Other issues include the need to conserve and enhance Wormwood Scrubs and the Grand Union Canal, the impact of new development on heritage assets and cumulative impacts on roads and rail infrastructure.

For the issues which have been identified, these are covered within the policies and mitigation measures are included where appropriate.

4.8 Technical Limitations and Uncertainties

During the assessment of the Regulation 19(2) Second Revised Draft Local Plan, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.

In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas and could

potentially be filled through the use of the monitoring framework. These gaps do not impact on the robustness of the IIA.

The Regulation 19(2) Second Revised Draft Local Plan essentially acts as a guidance document for the future development of the OPDC area. There is therefore reliance upon future decision-makers to ensure sustainable development is delivered.

5 Appraisal of Strategic Options

5.1 Affordable Housing Approaches

Appendix E includes an assessment of approaches to affordable housing provision that was carried out as part of the Regulation 18 IIA. A summary of the assessment findings is presented in **Table 5-1**. The four strategic options considered are briefly described below:

- **Approach 1 – Fixing the percentage**: This option describes an approach whereby a single OPDC wide figure is fixed for the level of affordable housing, subject to a regular review of viability and need. This is an approach supported in Opportunity Areas in the Mayor's draft Housing SPG. For this option OPDC would need to review viability on a regular basis to keep track of market changes. OPDC may also need to consider abnormal costs on specific sites in extreme circumstances and where clearly demonstrated and justified.
- **Approach 2 – Product dependent range**: Under this approach, the option would set a percentage range for each housing type to be provided recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. For example there may be a lower or higher level of affordable housing depending on the type of housing to be provided and the viability/ affordability of this housing.
- **Approach 3 – Viability based percentage**: This is the approach currently implemented by the three boroughs. A target percentage is set but this target is still subject to viability and each individual scheme would be viability tested to see how much affordable housing it could deliver.
- **Approach 4 – Negotiate a target on site specific basis**: This option seeks the maximum reasonable amount of affordable housing without specifying a percentage target to achieve for each development. A review of relevant economic data and viability for each site, to be provided by the applicant and tested by OPDC, will enable an allocation of affordable housing on the site to be negotiated and determined.

5.1.1 Summary of Assessment

No significant effects were predicted against Approaches 1, 2 and 3 of the assessment. However, significant negative effects were predicted in relation to the assessment of Approach 4, in relation to IIA Objectives: 13 (community cohesion and social exclusion); 14 (safety, crime and the fear of crime); and 15 (health and wellbeing). Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent knock-on effects for health and anti-social behaviour.

Approach 1 could create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to ensure that mixed communities and a sense of place is achieved. However, should this mean that fewer sites are developed, negative effects may result.

The product dependent range (Approach 2) could lead to inequalities across the OPDC area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against some of the sustainability objectives.

A viability based percentage (Approach 3) could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas. A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted for this approach.

Table 5-1 – Affordable Housing Approaches: Summary of Assessment

IIA Objective	Impact			
	Approach 1 – (Single) Fixed contribution across OPDC area	Approach 2 – Product dependent range	Approach 3 – Viability based percentage	Approach 4 – Negotiate a target on site specific basis
1. To enhance the built environment and encourage 'place-making'	0	0	0	0
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate	0	0	0	0
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	0	0	0	0
4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods	0	0	0	0
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	+/-	-	+/-	-
6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	0	0	0	0
7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	0	0	0	0
8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	0	0	0	0
9. Improve the quality of the water environment	0	0	0	0

IIA Objective	Impact			
	Approach 1 – (Single) Fixed contribution across OPDC area	Approach 2 – Product dependent range	Approach 3 – Viability based percentage	Approach 4 – Negotiate a target on site specific basis
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	0	0	0
11. To minimise air, noise and light pollution, particularly for vulnerable groups	0	0	0	0
12. To conserve and, where appropriate, enhance, cultural heritage	0	0	0	0
13. Increase community cohesion and reduce social exclusion	+/-	-	+/-	- -
14. Improve safety and reduce crime and the fear of crime	+/-	-	+/-	- -
15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	+/-	-	+/-	- -
16. To improve the education and skills levels of all members of the population, particularly vulnerable groups	0	0	0	0
17. Maximise the social and economic wellbeing of the population and improve access to employment and training	0	0	0	0
18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	0	0	0	0

6 Appraisal of the Spatial Vision and Narratives

6.1 Appraisal of the Spatial Vision

The Regulation 19(2) Second Revised Draft Local Plan includes a Spatial Vision and narratives, which shape the direction of the Local Plan policies. The Regulation 19(2) Second Revised Draft Local Plan Spatial Vision is:

Old Oak and Park Royal will be a highly connected part of London, playing an important role in shaping west London's future and driving national economic growth. It will comprise a network of places including an innovative industrial area in Park Royal and a high-density new vibrant part of London at Old Oak. It will be home to a diverse and intense mix of uses, places and people. Development will pioneer international excellence in sustainability, health and well-being and design quality to deliver tangible benefits for both local communities and London.

The draft spatial vision for the going local and the thinking big sections have been appraised against the 18 IIA Objectives. To aid the assessment, these have been renumbered from the Spatial Vision text in the Draft Local Plan but are presented below in separate tables to account for different narratives between Going Local and Thinking Big.

6.2 Appraisal of the Going Local and Thinking Big Narratives

The Objectives for the Regulation 19(2) Second Revised Draft Local Plan set out how the Spatial Vision could be achieved and have been renamed as Narratives. An appraisal of the narratives was undertaken in 2017 and as of April 2018, the narratives included below now represent the results of the latest version of the Local Plan. Changes to the both sets of narratives included minor word changes and changes to the numbering of the narratives.

These revisions resulted in no change to the assessment outcome of the Spatial Vision and ~~n~~Narratives presented in Section 6.3 below.

The narratives~~y~~ express the purpose of the Local Plan and what it aims to achieve. They embrace the aims and objectives of other key strategies important to OPDC. The Narratives included for assessment are as follows and split between ~~Going Local (considering local elements) and~~ Thinking Big (considering London-wide and national elements) and Going Local (considering local elements). The numbering reflects the table in:

~~**Going Local**~~

~~1. Improve **life chances and fairness** for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education, and social infrastructure.~~
~~2. Enhance **day-to-day quality of life** for local people by enabling a sense of ownership and attachment to places and providing access to town centres, shops, GPs, schools, nature and parks, community facilities, leisure, and sports.~~
~~3. Capture and generate **benefits from early development** for local people.~~
~~4. Provide a mix of **new homes** at different prices including affordable housing for local people.~~
~~5. Support **local economies** by creating opportunities for local businesses to access new markets, providing employment space and support for new business growth.~~
~~6. Create an attractive **built environment** comprising a network of places, good quality streets, open spaces and well-designed buildings that complements the surrounding neighbourhoods.~~
~~7. Conserve and enhance the existing rich social, cultural and built **environmental and heritage assets** such as Wormwood Scrubs, the Grand Union Canal, and the Rolls Royce Factory.~~
~~8. Ensure new development **connects** local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.~~

Thinking Big

1. High quality design will be showcased as part of new development, that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.

2. Old Oak will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.
3. The area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses.
4. Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond.
5. Wormwood Scrubs will be accessible MOL that will continue to perform its role as a district and metropolitan park.
6. It will be an exemplar in healthy and sustainable large-scale development.
7. Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.

Going Local

8. Local economies will be supported by creating opportunities for local businesses to access new markets and provide a mix of employment space to support new business growth.
9. The areas' existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, Kensal Green Cemetery the Grand Union Canal and the Rolls Royce Factory will be conserved and enhanced.
10. An attractive built environment will be created comprising a network of new and enhanced places enabling people to enjoy good quality streets, open spaces and well-designed buildings that complement surrounding neighbourhoods.
11. A mix of new homes will be delivered at different prices including affordable housing for local people.
12. Benefits from development will be generated for local people.
13. New development will connect local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.
14. Life chances and fairness will be improved for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education and social infrastructure.
15. Day-to-day quality of life will be enhanced for local people by enabling a sense of ownership, empowerment, safety and provision of convenient access to town centre uses, shops, GPs, schools, nature and parks, community facilities, leisure and sports.

~~**Going Local**~~

1. ~~Improve life chances and fairness for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education, and social infrastructure.~~
2. ~~Enhance day-to-day quality of life for local people by enabling a sense of ownership and attachment to places and providing access to town centres, shops, GPs, schools, nature and parks, community facilities, leisure, and sports.~~
3. ~~Capture and generate benefits from early development for local people.~~
4. ~~Provide a mix of new homes at different prices including affordable housing for local people.~~
5. ~~Support local economies by creating opportunities for local businesses to access new markets, providing employment space and support for new business growth.~~
6. ~~Create an attractive built environment comprising a network of places, good quality streets, open spaces and well-designed buildings that complements the surrounding neighbourhoods.~~
7. ~~Conserve and enhance the existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, the Grand Union Canal, and the Rolls Royce Factory.~~
8. ~~Ensure new development connects local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.~~

6.3 Appraisal Findings

The Spatial Vison and its objectives has changed from the Regulation 18 Local Plan to the ~~current~~ vision and narratives for the Regulation 19(~~2~~21) ~~Second~~ Revised Draft Local Plan as above in order provide further detail to the Spatial Vision by expanding the Vision Statement and fulfilling the role of objectives. They define outcomes of development and regeneration at both the national and regional scale by 'thinking big', and

importantly 'going local' to set out how local people will benefit from change and how neighbourhoods will improve.

Table 6-1 presents the compatibility of the Regulation 19(21) Second Revised Draft, and thereby the Regulation 19(2) Second Revised Draft, Local Plan Narratives against the IIA Objectives. The assessment can be summarised as follows:

Thinking Big Narrative 61: High quality design will be showcased in good development

By creating high quality design will be showcased in good development which will set new international standards in high density commercial, industrial and residential development, it may optimise land efficiency and development densities. The policy aims to create high quality design for residential units which will score positively against IIA objective 5. This policy may incorporate safety into design and maximises social and economic wellbeing and encourage inward investment within the area.

Thinking Big Narrative 52: destination

The narrative aims to deliver an area will become a destination for people from across all of London and the UK and will be home to a mix of cultural and leisure uses. By delivering mixed use development, this will positively affect place-making. This IIA objective will increase community cohesion and reduce social exclusion. Health will benefit from the creation of new leisure facilities such as gyms. This in turn can help contribute to the social wellbeing of individuals. Depending on the types of cultural and leisure facilities, it is likely they will positively contribute to economic wellbeing of the area.

~~**Thinking Big Narrative 1: transport hub**~~

~~A thriving major transport hub at Old Oak should help improve the built environment and encourage 'place-making'. This narrative will lead to an increase in use of public transport and a decrease in private car vehicles. Less cars on the roads will also contribute to climate change by releasing less greenhouse gases into the atmosphere. This will also help to tackle air pollution and pressures on natural resources such as fossil fuels. Good transport links will encourage inward investment to the area and reflect positively against social inclusion.~~

Thinking Big Narrative 23: major new London centre

The narrative's aim is that Old Oak will become a major new London centre providing high-density mixed-use development, shaping west London, and supporting London's continued growth. This is important in place-making. The high density use of development will create opportunities to maximise land efficiency and reuse of land. This policy will increase social inclusion and shape growth for the area. It will also maximise social and economic wellbeing and encourage inward investment within the area.

Thinking Big Narrative 14: transport hub

A thriving major transport hub at Old Oak should help improve the built environment and encourage 'place-making'. This narrative will lead to an increase in use of public transport and a decrease in private car vehicles. Less cars on the roads will also contribute to climate change by releasing less greenhouse gases into the atmosphere. This will also help to tackle air pollution and pressures on natural resources such as fossil fuels. Good transport links will encourage inward investment to the area and reflect positively against social inclusion.

~~**Thinking Big Narrative 3: London's largest and most successful industrial area**~~

~~The narrative's aim is for Park Royal to continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth. This will have positive benefits on place-making, increasing community cohesion, social inclusion, economic inclusion and encourage inward investment due to being London's most successful and largest industrial area.~~

~~**Thinking Big Narrative 4: district and metropolitan park**~~

~~The aim of this narrative is to ensure that Wormwood Scrubs will continue to perform its role as a district and metropolitan park. By maintain its role as a district and metropolitan park, this will encourage place-making. It will enhance biodiversity and create a sense of community. By maintaining green space, it will have benefits to health by encouraging people to exercise outside. This policy will also maximise social wellbeing.~~

~~**Thinking Big Narrative 5: destination**~~

~~The narrative aims to deliver an area will become a destination for people from across all of London and the UK and will be home to a mix of cultural and leisure uses. By delivering mixed use development, this will positively affect place-making. This IIA objective will increase community cohesion and reduce social exclusion. Health will benefit from the creation of new leisure facilities such as gyms. This in turn can help contribute to the social wellbeing of individuals. Depending on the types of cultural and leisure facilities, it is likely they will positively contribute to economic wellbeing of the area.~~

Thinking Big Narrative ~~4~~5: district and metropolitan park

The aim of this narrative is to ensure that Wormwood Scrubs will continue to perform its role as a district and metropolitan park. By maintain its role as a district and metropolitan park, this will encourage place-making. It will enhance biodiversity and create a sense of community. By maintaining green space, it will have benefits to health by encouraging people to exercise outside. This policy will also maximise social wellbeing.

~~**Thinking Big Narrative 6: High quality design will be showcased in good development**~~

~~By creating high quality design will be showcased in good development which will set new international standards in high density commercial, industrial and residential development, it may optimise land efficiency and development densities. The policy aims to create high quality design for residential units which will score positively against IIA objective 5. This policy may incorporate safety into design and maximises social and economic wellbeing and encourage inward investment within the area.~~

Thinking Big Narrative ~~7~~6: healthy and sustainable

The narrative aims to be exemplar in international healthy and sustainable large-scale development. Sustainable development plays an important role in place-making. It can increase community cohesion. The policy states an aim to develop exemplar health on large scale developments which will have a positive effect on the health IIA objective. The narrative also scores positively against the social and economic wellbeing IIA objective and the inward investment IIA objective.

Thinking Big Narrative 7: London's largest and most successful industrial area

The narrative's aim is for Park Royal to continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth. This will have positive benefits on place-making, increasing community cohesion, social inclusion, economic inclusion and encourage inward investment due to being London's most successful and largest industrial area.

Going Local Narrative ~~5~~8: local economies

The narrative aims to support local economies by creating opportunities for local businesses to access new markets, providing employment space and support for new business growth. Business development and supporting local economies can contribute to place-making in IIA objective 1. The policy itself aims to create access so will positively affect IIA objective 4. For IIA objective 13, new jobs will help to create a sense of community. New jobs will create a range of new skills and give individuals increasing number of skills and qualifications. It will also maximise economic wellbeing and encourage inward investment.

Going Local Narrative ~~7~~9: environmental and heritage assets

The narrative aims to conserve and enhance the existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, the Grand Union Canal, and the Rolls Royce Factory. This can positively affect place-making. It will have a positive effect on improving water quality as the objective includes the preservation and enhancement of Grand Union Canal. It scores positively against the

biodiversity and heritage IIA objectives as the policies focus is to enhance and preserve these. The enhancement of the built environment can positively affect health as and social wellbeing as it encourages locals to go outside and interact.

Going Local Narrative ~~6~~10: built environment

The narrative seeks to create an attractive built environment comprising a network of places, good quality streets, open spaces and well-designed buildings that complements the surrounding neighbourhoods. An attractive environment can help to create a sense of place. Well-designed buildings in the objective imply that efficient land use will be optimised though increased development densities where possible and potentially maximise reuse of previously developed land. By delivering a network of places, this can help minimise the need to travel by private motorised vehicles and encourage walking, cycling and sustainable transport. The inclusion of good quality open spaces can help to conserve and enhance biodiversity and increase health and wellbeing by encouraging individuals to go outside. The good quality streets included in this objective can help to reduced crime and increase safety if designed well. Increased development pressures can lead to an increase in waste produced.

Going Local Narrative ~~4~~11: new homes

The narrative aims to provide a mix of new homes at different prices including affordable housing for local people. New homes will benefit place-making by creating a sense of place and community. It will positively impact on IIA objective 5 which is to improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs. New housing, with a variety of prices in several different locations will also have positive effects against social inclusion, the economy and inward investment.

Going Local Narrative 12: benefits from development

The narrative seeks to capture and generate benefits from development for local people. This will positively benefit IIA objectives in relation to place-making, social inclusion and promoting economic investment and encourage investors to develop in the area. The description text does not provide much ~~information~~information, so it cannot be certain that this objective will have other positives against other IIA objectives.

Going Local Narrative ~~8~~13: connections

The narrative ensures new development connects local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links. This will play an important role in place-making. It will also have a positive effect on the access IIA objective as the whole objective aims to develop connections through walking, cycling and public transport. Even though the policy includes vehicular links too, the provision of other transport methods could discourage use of private motorised vehicles. This policy can positively affect community cohesion and social wellbeing of the local and regional population as it connects communities together.

Going Local Narrative 1~~4~~: life chances and fairness

This narrative aims to improve life chances and fairness for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education, and social infrastructure. This will positively benefit place-making, thus scoring positively against IIA objective 1. The text states that access to skills, education and social infrastructure will be included so will have a positive effect against the IIA objectives 4 and 5. By focusing on new development opportunities and providing access, this will positively benefit community cohesion, maximise health, improve skill levels, maximise the social and economic wellbeing of the population and encourage inwards investment.

Going Local Narrative ~~2~~15: day-to-day quality of life

This narrative aims to enhance day-to-day quality of life for local people by enabling a sense of ownership and attachment to places and providing access to town centres, shops, GPs, schools, nature and parks, community facilities, leisure, and sports. By creating access to town centres and amenities, this will have positive effects against IIA objectives 3 and 4. It will minimise the need to travel by motorised vehicles if

better sustainable methods of transport are available. The inclusions of nature and park facilities will benefit the biodiversity and water quality IIA objectives. By focusing on access and enhancing quality of life for people, and including better access to town centres and shops, this will positively benefit community cohesion, maximise health, improve skill levels, maximise the social and economic wellbeing of the population and encourage inwards investment.

~~Going Local Narrative 3: benefits from early development~~

~~The narrative seeks to capture and generate benefits from early development for local people. This will positively benefit IIA objectives in relation to place-making, social inclusion and promoting economic investment and encourage investors to develop in the area. The description text does not provide much information so it cannot be certain that this objective will have other positives against other IIA objectives.~~

~~Going Local Narrative 4: new homes~~

~~The narrative aims to provide a mix of new homes at different prices including affordable housing for local people. New homes will benefit place-making by creating a sense of place and community. It will positively impact on IIA objective 5 which is to improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs. New housing, with a variety of prices in several different locations will also have positive effects against social inclusion, the economy and inward investment.~~

~~Going Local Narrative 5: local economies~~

~~The narrative aims to support local economies by creating opportunities for local businesses to access new markets, providing employment space and support for new business growth. Business development and supporting local economies can contribute to place-making in IIA objective 1. The policy itself aims to create access so will positively affect IIA objective 4. For IIA objective 13, new jobs will help to create a sense of community. New jobs will create a range of new skills and give individuals increasing number of skills and qualifications. It will also maximise economic wellbeing and encourage inward investment.~~

~~Going Local Narrative 6: built environment~~

~~The narrative seeks to create an attractive built environment comprising a network of places, good quality streets, open spaces and well designed buildings that complements the surrounding neighbourhoods. An attractive environment can help to create a sense of place. Well designed buildings in the objective imply that efficient land use will be optimised though increased development densities where possible and potentially maximise reuse of previously developed land. By delivering a network of places, this can help minimise the need to travel by private motorised vehicles and encourage walking, cycling and sustainable transport. The inclusion of good quality open spaces can help to conserve and enhance biodiversity and increase health and wellbeing by encouraging individuals to go outside. The good quality streets included in this objective can help to reduced crime and increase safety if designed well. Increased development pressures can lead to an increase in waste produced.~~

~~Going Local Narrative 7: environmental and heritage assets~~

~~The narrative aims to conserve and enhance the existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, the Grand Union Canal, and the Rolls Royce Factory. This can positively affect place making. It will have a positive effect on improving water quality as the objective includes the preservation and enhancement of Grand Union Canal. It scores positively against the biodiversity and heritage IIA objectives as the policies focus is to enhance and preserve these. The enhancement of the built environment can positively affect health as and social wellbeing as it encourages locals to go outside and interact.~~

~~Going Local Narrative 8: connections~~

~~The narrative ensures new development connects local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links. This will play an important role in place making. It will also have a positive effect on the access IIA objective as the whole objective aims to develop connections through walking, cycling and public transport. Even though the policy includes~~

~~vehicular links too, the provision of other transport methods could discourage use of private motorised vehicles. This policy can positively affect community cohesion and social wellbeing of the local and regional population as it connects communities together.~~

Table ~~5~~6-1 Compatibility of the Local Plan Narrative with the IIA Objectives

Key

✓ = Objectives are compatible

✘ = Objectives are potentially incompatible if not appropriately mitigated

0 = There is no link between objectives

? = The link between the objectives is uncertain

IIA Objective		Thinking Big narrative						
		1	2	3	4	5	6	7
1	To enhance the built environment and encourage 'place-making'	0	✓	✓	✓	✓	✓	✓
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	?	?	✓	?	0	?	?
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	?	?	✓	?	0	?	?
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	?	0	?	✓	0	?	?
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	✓	0	0	✓	0	?	0
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	0	0	0	✓	0	0	0
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	0	0	0	✓	0	0	0
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	0✘	0	✘	✘	0	0✘	0✘

IIA Objective		Thinking Big narrative 1	2	3	4	5	6	7
9	Improve the quality of the water environment	0	0	0	0	?	0	0
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	?	0	0	✓	?	0
11	To minimise air, noise and light pollution, particularly for vulnerable groups	0	0	0	✓	?	?	0
12	To conserve and enhance the historic environment, heritage assets and their settings	0	?	0	0	?	?	0
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	0	✓	✓	✓	✓	✓	✓
14	Improve safety and reduce crime and the fear of crime	?	0	0	0	0	?	0
105	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	0	✓	?	0	✓	✓	?
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	0	?	?	0	0	0	?
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	✓	✓	✓	✓	✓	✓	✓
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	✓	0	✓	✓	0	✓	✓

IIA Objective		Going Local narrative ~~1~~8	~~2~~9	~~3~~10	~~4~~11	~~5~~12	~~6~~13	~~7~~14	~~8~~15
1	To enhance the built environment and encourage ‘place-making’	✓	✓	✓	✓	✓	✓	✓	✓
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	?	0	✓	?	?	0	?	?
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	?	0	✓	?	?	0	?	?
4	Minimise the need to travel, improve accessibility for all users by public and non-	✓	0	✓	0	?	✓	✓	✓

IIA Objective		Going Local narrative							
		~~1~~8	~~2~~9	~~3~~10	411	~~5~~12	~~6~~13	~~7~~14	~~8~~15
	motorised transportation methods and mitigate impacts on the transport network								
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	0	0	✓	✓	0	0	✓	✓
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	0	0	0	0	0	0	0	?
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	0	0	0	0	?	0	?	?
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	0	0	0	0	0	0	0	0
9	Improve the quality of the water environment	0	✓	0	0	0	0	0	✓
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	✓	✓	✘	0	0	?	✓
11	To minimise air, noise and light pollution, particularly for vulnerable groups	0	0	0	0	0	0	?	?
12	To conserve and enhance the historic environment, heritage assets and their settings	0	✓	0	0	0	0	?	?
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	✓	✓	✓	✓	✓	✓	✓	✓
14	Improve safety and reduce crime and the fear of crime	0	0	✓	0	?	0	?	?
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	0	✓	✓	0	?	0	✓	✓
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	✓	0	0	0	?	0	✓	✓

IIA Objective		Going Local narrative							
		~~1~~8	~~2~~9	~~3~~10	411	~~5~~12	~~6~~13	~~7~~14	~~8~~15
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	✓	✓	✓	✓	✓	✓	✓	✓
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	✓	0	✓	✓	✓	0	✓	✓

6.3.1 Appraisal Summary

The main issue regarding the 'Thinking Big' narratives revolves around the increased production of waste that would be brought about through the implementation of narrative 1, 3, and 4~~, 6 and 7~~, consequently resulting in a negative impact against IIA Objective 8 though it's worth noting that the Circular Economy aspirations may further mitigate these.~~.~~ A number of uncertainties were recorded for the Thinking Big narratives. Frequent uncertainties were recorded against IIA Objectives 2 (high density buildings), 3 (previously developed land), 7 (climate change) and 14 (crime and safety). These uncertainties are a result of the intentionally broad nature of the Thinking Big narratives.

Only one negative impact was recorded for the 'Going Local' narratives against IIA Objective 4 relating to biodiversity. This is mainly due to the Wormwood Scrubs Local Nature Reserve (LNR) being adjacent to Old Oak Common train station. Construction works with regards to further improvements or expansion of the station would likely have a negative effect on the LNR if not appropriately mitigated. A number of uncertainties were recorded for the Going Local narratives. Frequent uncertainties were recorded against IIA Objectives 2 (high density buildings), 3 (previously developed land), 4 (travel), 12 (historic environment) and 16 (education and skills). These uncertainties are a result of the intentionally broad nature of the Thinking Big narratives.

6.3.2 Recommendations

~~Going Local~~Thinking Big

- It is recommended that the narratives include reference to mitigation for production of waste and include recycling and re-use.

~~Going Local~~

- ~~It is recommended that narrative 4 includes reference to ensuring that no net loss of Wormwood Scrubs LNR should occur as a result of any infrastructure-related development in Old Oak.~~

7 Appraisal of Regulation 19(2) Second Revised Draft Local Plan Policies

This Chapter provides a summary of the results of the IIA of the Regulation 19(2) Second Revised Draft Local Plan, dated 4th 5th April 2018 7. The detailed results of the assessments of the Policies are presented in **Appendix D**. The policy wording can be found in the Regulation 19(s) Second Revised Draft Local Plan which accompanies this IIA Report for consultation. As noted earlier in this report, the assessments have been grouped by Local Plan chapter. As such, this is how the assessment is presented in this section.

The draft Regulation 19(2) Second Revised Draft version of the Local Plan has been amended from the draft Regulation 18 19(1) version in response to consultation responses, updated supporting studies, the Draft New London Plan and changes to national planning guidance. The draft reflects the role of a Regulation 19 document by providing proposed policies instead of policy options.

The Regulation 19(1) Revised Draft Local Plan was previously amended from the draft Regulation 18 version in response to consultation comments, evidence base outputs and recommendations from OPDC's Place Review Group. This has seen a change in the structure to provide a clearer differentiation between Strategic Policies, Place Policies and Development Management Policies. The draft reflects the role of a Regulation 19 document by providing proposed policies instead of policy options. Further emphasis on existing and future local communities has also been provided.

The IIA Report has been updated to reflect both minor wording changes in policies between the Regulation 18 19(1) and this version, as well as the assessed assessment of twothree new replacement policies (P2, E1 and E2) where applicable. This is part of the iterative nature of the SA process. The results of these assessments are presented in this IIA Report as well as the supporting Appendices. The assessment methodology remains the same.

These revisions resulted in no significant change to the assessment outcomes of Local Plan Policies.

7.3 Strategic Policies

The Policies included within **Table D-1** of **Appendix D** are as follows:

- SP1: City in the WestCatalyst for Growth
- SP2: Good Growth
- SP3: Improving Health, Wellbeing and Active Lifestyles and Reducing Health Inequalities
- SP4: Thriving Communities
- SP5: Economic Resilience
- SP6: Places and Destinations
- SP7: Connecting People and Places
- SP8: Green Infrastructure and Open Space
- SP9: Built Environment
- SP10: Integrated Delivery

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. These Strategic Policies have been expanded upon compared to those Overarching Strategic Policies in Regulation 18 Draft Local Plan assessment as a result of the further studies and strategies and the review of the Places Group. A summary of the key IIA findings is presented below.

7.3.1 Summary of Assessment

The aim of the Strategic Policies is to set the scene and provide clear direction as to how the area will be developed throughout the Local Plan period. It is a chance to transform an area of London in order to meet London's strategic housing need, provide commercial floor space to suit and support a diverse economy as

well as support London's growing population with social infrastructure facilities. The policies also seek to protect current communities, existing green spaces as well as aim to provide more opportunities for greening and water protection, especially in light of a changing climate.

The wording of SP1 acts as an overarching spatial strategy as to what the OPDC area will aim for, with the remaining Strategic Policies providing clearer direction around specific elements of how to build a community such as SP3 which seeks to ensure that, for example, health and educational facilities will be delivered alongside housing numbers for all members of society (SP4) and that biodiversity, open spaces and water quality will become a major part of this new area of London. The majority of effects against the objectives are predicted to be positive. In particular, major positive effects can be seen against IIA objectives 1 – place-making (SP2 and SP6), 2 – efficient land use (SP2), 3 – reuse of previously developed land (SP4), 4 – minimise need to travel (SP7), 5 – access to housing (SP4), 6 – improve climate change adaptation (SP2), 10 - biodiversity (SP8), 12 – historic environment (SP9), 15 – health & well-being (SP3), and 17 – social & economic well-being & 18 – inward investment (SP5).

Although no major negative effects were predicted against the IIA Objectives, some minor negatives can be seen against IIA Objective 9 – water environment (SP1), 10 – biodiversity (SP1), 11 – minimise pollution (SP1) and 12 – historic environment (SP1). This is due to the area experiencing a great deal of change in terms of increased densities of development throughout the plan period, particularly during intensive construction phases and with particular focus in the area around Old Oak due to Crossrail/HS2 and the redevelopment of the Cargiant sites. Although these effects are mitigated by other Strategic Policies being proposed as part of the Local Plan, it is still worth highlighting in order to ensure that all aspects of the Local Plan will be used to drive forward development for OPDC that takes into account its current existing environment.

Recommendations:

No additional recommendations to be made. Earlier recommendations have been incorporated.

7.4 Places

The Policies included within **Table D-2** of **Appendix D** are as follows:

- P1: Old Oak South
  - P1C1 Old Oak Common Station
- P2: Old Oak North
  - ~~P2C1 Grand Union Square~~
- P3: Grand Union Canal
- P4: Park Royal West
  - P4C1 Brewery Cluster
- P5: Old Park Royal
- P6: Park Royal Centre
  - ~~P6C1: ASDA~~
- P7: North Acton and Acton Wells
  - P7C1 North Acton Town Centre Cluster
  - P7C2 Old Oak Common Lane Station Cluster
- P8: Old Oak Lane and Old Oak Common Lane
  - P8C1 Atlas Junction Town Centre Cluster
- P9: Channel Gate
- P10: Scrubs Lane
  - P10C1 Harrow Road Cluster
  - P10C2 Laundry ~~Lane~~Cluster

  - P10C3 Hythe Road Cluster
  - P10C4 Mitre Canalside Cluster
- P11: Willesden Junction
- P12: Wormwood Scrubs

Compared to the assessment of the Places section carried out for the Regulation 18 Draft Local Plan, this section has had some changes in order to cement the strategic direction and aid delivery of these Places, the clusters and the site allocations identified. Further Place policies have been written in order to provide greater clarity of how different parts of the OPDC area will be developed and what would be acceptable in various locations. Some policies have identified Clusters which specify guidance for parts of the Place with more certainty, such as a greater direction on where tall buildings would be acceptable in relation to its surroundings. Most Place policies have identified site allocations as part of their remit. These have been assessed alongside the Place and Clusters in **Appendix D**.

The only structural changes to the places made to the Regulation 19(2) Second Revised Draft Local Plan are the removal of Policy P2C1 Grand Union Square and Policy P6C1 ASDA. These were removed to prevent repetition with their relevant parent place policies.

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below.

7.4.1 Summary of Assessment

The majority of effects against each of the policies are predicted to be positive. An overarching highlight against each Place policy is listed below, with recommendations for the Places chapter provided. An intensification of development in this area and for this duration will bring about its challenges for not just the existing residents and businesses but also those who start to move in amidst the change. How these impacts will be felt across the OPDC area and beyond it, particularly on the existing road network and to existing businesses and residents will rely heavily on strong policies elsewhere in the Local Plan so as to minimise the scale and cumulative aspects of those impacts. As such, the direction of the Place policies, their clusters and any site allocations give have been considered in light of the other Local Plan policies being proposed.

P1 – Old Oak South and clusters
Significant housing provision is included within the policy including for specialist housing to meet local needs, resulting in a major positive impact on access to housing. eEmployment, town centre and mixed uses are also proposed for this area and the cluster policy accounts for providing further detail on Old Oak Common Station and the aspirations of OPDC in creating connections and open spaces in order enable place-making and to encourage a sense of community. A range of social infrastructure is identified to be provided, including a primary school, health facility, community hub and leisure centre. The delivery of Old Oak South will seek to meet IIA Objectives around minimising need to travel, sustainable travel and help mitigate against climate but also seek to protect and open up the Grand Union Canal and create better links with Wormwood Scrubs.

P2 – Old Oak North
Significant housing, employment, town centre and mixed uses is also being proposed for this area, and with the creation of a new potential station at Hythe Road this will create a better linkage with wider London as well enable sustainable transport options for the existing residents and businesses. A range of social infrastructure is to be provided, including a primary school, community hub and leisure centre. The policy seeks to ensure that the surface water flooding, and to protect and make better use of the Grand Union Canal as green infrastructure and for opening up the area. This will contribute positively to creating a sense of place, and the supporting text also seeks to promote meanwhile uses for the area so as to attract early inward investment.

P3 – Grand Union Canal

This policy seeks to protect the Grand Union Canal, its roles as a Conservation Area and Site of Importance to Nature Conservation and to open up the canalside in order to create a sense of place with moorings and waterfront development.

P4 – Park Royal West and cluster

This policy seeks to ensure that the Strategic Industrial Location is protected as well as enhanced in accordance with other employment policies in order to attract inward investment for OPDC. The policy aims to improve the transport links of the A40 and A406. The cluster at Brewery is proposed to be a mixed-use development which has good transport links and given its proximity to an established open space, careful design of this will be required.

P5 – Old Park Royal

This policy seeks to protect the SIL compliant broad industrial type uses and encourage other types into the area by providing flexible space around this. The policy aims to improve the transport links into the area so as to reduce the high levels of car parking currently present. This will improve on sustainable travel and can enable a better public realm for the area and increase its attractiveness for future employment uses.

P6 – Park Royal Centre ~~and cluster~~

The~~se policies~~ This policy will enable a greater support of the current and future economic functions of Park Royal as a whole. It aims to encourage, through mixed-use redevelopment, more active frontages for the area so as to better support the local working population with cafes and other shops. This can encourage a reduction in crime and by improving an existing road junction, encourage community cohesion as a better neighbourhood centre is established.

P7 – North Acton and Acton Wells and clusters

These policies will ensure that flexible workspaces, particularly for small businesses, are created and therefore can create inward investment. New and improved walking and cycling routes will be supported to the proposed Old Oak Common Lane Station and to the existing North Acton station. It seeks to guide mixed used development on Acton Wells and support the continuation of Old Oak ~~High~~ Street from Old Oak South. ~~A secondary school is also identified to be delivered on Acton Wells.~~ Careful consideration of existing residents and building densities need to be considered in forthcoming planning applications for the area so as to ensure that construction impacts are minimised and residential densities proposed respond to surrounding sensitive locations including local heritage assets and public transport accessibility.

P8 – Old Oak Lane and Old Oak Common Lane and cluster

This policy seeks to support the delivery of a new town centre and a range of new and improvement walking, cycling and vehicular routes. Housing is proposed in locations which will contribute to OPDC overall housing need. Both the place and cluster policies acknowledge that much can be done in the way of greening both Old Oak Lane and Old Oak Common Lane. This scores positively against enhancing biodiversity and improving travel routes.

P9 – Channel Gate

This policy aims to support job opportunity creation and support new industrial innovation and intensification that will attract inward investment to the area as well as encourage new transport links across the existing railways and the Grand Union Canal. The policy seeks to conserve and enhance existing heritage features such as ~~Plantagenet House and~~ Old Oak Lane Conservation Area, thus acknowledging the areas industrial heritage.

P10 – Scrubs Lane and clusters

This policy and cluster provides greater clarity around the proposed housing and employment floorspace and acknowledges that the area will be development in the early stages of the plan period. The mix of uses within each cluster will foster a sense of community as well as provide cafes and restaurants along the Grand Union Canal. The policy recognises that Cumberland Park is a new Conservation Area which scores positively against the heritage IIA objective.

P11 – Willesden Junction

This policy seeks to redefine Willesden Junction as an improve~~d~~ transport interchange~~d~~ located on Old Oak ~~High~~ Street and mixed use neighbourhoods. High density development is proposed here which will need to take into account how this will be mitigated for existing residential areas to the north

P12 – Wormwood Scrubs
This policy seeks to conserve and enhance this cherished open space and enable people to access it. Further measures are proposed in order for the area to address and manage surface water flooding, thus improving climate change adaptation and a more coherent policy in order to protect, will help cement its role in place-making. By continuing to provide this space, the health and well-being of the local population can be improved.

Recommendations:
It would be recommended to ensure policies and clusters are clearly depicted on legible maps and diagrams.
~~It is also~~furthermore, it is recommended that P12 includes reference to ensuring that no net loss of Wormwood Scrubs LNR should occur as a result of any infrastructure-related development in Old Oak.

7.5 Design

The Policies included within **Table D-3 of Appendix D** are as follows:

- D1: Securing high quality design
- D2: Public Realm
- D3: Inclusive design
- D4: Well-designed buildings
- D5: Tall buildings
- D6: Amenity
- D7: Key views
- D8: Heritage
- D9: Play Space

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below along with policy recommendations.

7.5.1 Summary of Assessment

The Design chapter seeks to provide a range of design related guidance for the redevelopment of the OPDC area. Strong design policies that are part of the Local Plan will enable a high quality and standard for the area as whole.

The majority of effects against the policy component are predicted to be positive. Major positive effects are predicted for IIA objective 1 – place-making for policies D1, D2, D4 and D8, IIA objective 4 – minimise need to travel for policy D2 and 12 – historic environment for D8. The preferred policies acknowledge the need to consider Old Oak's long term regeneration and the intensification of uses in Park Royal are borne out by a policy that secures high quality design (D1) and also that seeks to ensure that the context of that development (in effect, its public realm) is also supported along similar principles. Policy D8 specifically references the area's historic environment and its change from a rural landscape to a critical part of industrial London starting with the arrival of the railways. Its major positive against IIA objective 12 is justified as the policy goes beyond the need to protect designated assets and also seeks to protect non-designated assets as far as practicably possible.

A minor negative is predicted for policy D4 in relation to IIA objective 8 – minimise waste. The development of new buildings can increase waste being produced during construction and demolition if not appropriate mitigated. The policy references sustainable materials and appropriate waste storage but the policy can also ensure that waste minimisation is considered in new building construction.

Recommendations:
It is recommended that the design policies include strong references to the environmental policies.

7.6 Environment and Utilities

The Policies included within **Table D-4** of **Appendix D** are as follows:

- EU1: Open Space
- EU2: Urban Greening and Biodiversity
- EU3: Water
- EU4: Air Quality
- EU5: Noise and vibration
- EU6: Waste
- EU7: Circular and Sharing economy
- EU8: Sustainable materials
- EU9: Minimising Carbon Emissions and Overheating
- EU10: Energy Systems
- EU11: Smart Technology
- EU12: Extraction of minerals
- EU13: Land contamination

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below.

7.6.1 Summary of Assessment

The Environment chapter seeks to provide a range of environment related guidance for the redevelopment of the OPDC area. Strong environment policies that are part of the Local Plan will ensure that the environmental impact of the large-scale change is minimised as much as possible whilst also encouraging innovation in reducing impact further.

The majority of effects against the policy component are predicted to be positive. Major positive effects are predicted for IIA objective 1 – place-making for policies EU1 and EU2, IIA objective 3 – previously developed land for EU13, IIA objective 6 – climate change adaptation for EU1, EU2, EU3 and EU10, IIA objective 8 – waste for EU6, IIA objective 9 – water quality for EU3, IIA objective 10 – biodiversity for EU1 and EU2, IIA objective 11 – air and noise for EU4 and EU5, and IIA objective 12 – historic environment for EU1. Both positive and negative effects can be seen around the EU12 in relation to its overall impact on the environment in terms of extraction but these impacts can be adequately mitigated against through other policies within the Local Plan.

The preferred policies acknowledge the need to consider Old Oak's long term regeneration and the intensification of uses in Park Royal are borne out by policies that not only seek to improve the existing urban environment by including more open space and improve biodiversity (EU1 and EU2) but also seeks to protect and enhance existing natural environment spaces within the OPDC area as a whole. Policies such as EU7, EU9 and EU11 acknowledge that a different approach to the traditional linear economy coupled with latest smart technology can help to mitigate the impact that urban environments have on climate change.

Recommendations:
Policies read as mainly robust and strong in setting out what the OPDC would consider acceptable under the broader umbrella of environment. Some uncertainty and strengthening could be seen in relation to waste and energy sites and how to minimise their impact on the landscape character, local area and biodiversity/ water infrastructure. However, the assessment recognises that these elements are addressed elsewhere in the plan. As such, the policies would benefit from having strong references to other sections of the Local Plan, specifically in relation to the air quality, sustainable transport, security and safety and water quality.

7.7 Transport

The Policies included within **Table D-5** of **Appendix D** are as follows:

T1: Roads and streets
T2: Walking
T3: Cycling
T4: Parking
T5: Rail
T6: Buses
T7: Freight, servicing and deliveries
T8: Construction
T9: Transport Assessments and Travel Plans

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below. In order to improve the sustainability performance of the policy, detailed recommendations are suggested in **Appendix D**.

7.7.1 Summary of Assessment

The regeneration of Old Oak, and intensification of Park Royal will be made possible by new and improved transport links acting as a catalyst. These transport links extend beyond roads to walking/cycling routes, new London Overground stations and the arrival of Old Oak Common Station. The majority of effects against the policy component are predicted to be positive. No major effects, either positive or negative, were predicted for Policies T1, T7 and T9. Major positive effects are predicted for the following IIA Objectives 4 - minimise travel (T4), 8 – minimise waste (T8), 13 – community & welfare (T6), 15 – maximise health & well-being (T2), 16 – improve education (T6), 17 – social & economic well-being (T3 and T5) and 18 – inward investment (T2, T3, T4 and T5).

A mixed impact (positive and negative) can be seen for a few of the proposed policies, particularly around IIA objectives 10 – biodiversity (T5), 11 – pollution (T1, T6, T7, T8), 15 – health and wellbeing (T4, T7 and T8) 17 – social & economic well-being (T4) and 18 – inward investment (T1). These relate mainly to expected increase of development being proposed and how that careful consideration needs to be given to how the construction phases of the regeneration of OPDC can be minimised in order to minimise impact but also that the long-term outcome of the regeneration will provide for a better environment for the existing and new population overall.

A negative impact can be seen for IIA objective 9 – water environment for policies T7 and T8 in relation to increased development pressures that could impact on pollution run-off to watercourses, but it is important to reiterate that these aspects will be mitigated by policies within the Environment chapter.

Recommendations:
As a whole, the policies work well together. Some uncertainty remains around T9 and how TfL's guidance could indirectly affect access and locations of residential development and how this could potentially slow down what IIA objective – housing seeks to improve and T1 in relation to how roads and streets could enhance biodiversity (IIA objective 10) and create and improve green corridors.

7.8 Housing

The Policies included within **Table D-6** of **Appendix D** are as follows:

- H1: Housing Supply
- H2: Affordable Housing
- H3; Housing Mix
- H4; Family Housing
- H5: Existing Housing

- H6: Build to Rent
- H7: Purpose-built Co-Living and other housing with shared facilities
- H8: Gypsy and Traveller Accommodation
- H9: Specialist Housing
- H10: Student Accommodation

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below.

7.8.1 Summary of Assessment

The Regulation 19(2) Second Revised Draft Local Plan aims to deliver a significant amount of new homes over the course of the plan period, and the chapter acknowledges that the OPDC area forms a significant part of meeting London's housing need, across all tenures and needs. H2 seeks to ensure that affordable housing is afforded the same design standards as market housing and aiming to make residential developments tenure blind. The majority of effects are predicted to be positive and collectively, the policies will encourage place-making for the regeneration of the OPDC area. Major positive effects are predicted for IIA objective 1 – place-making (H1 and H2), IIA objective 5 – access to housing (H1, H2 and H3) and 13 – community and welfare (H2, H3 and H9).

No major negatives are predicted against the IIA objectives for the policies though minor negative impacts can be expected in relation to IIA objective 3 – efficient use of land (H8), 3 – previously developed land (H8), 7 – minimise climate change (H1, H2 and H6), 8 – production of waste (H1, H2, H6), 9 – water environment (H1, H2 and H6), 10 – biodiversity (H1, H2 and H6), 11 – pollution (H1, H2 and H6), 12 – historic environment (H1, H2 and H6) as well as 14 – reduce crime (H10). In the main, there's a natural conflict between increasing development densities in an area of brownfield sites and how this will impact on the existing baseline environment but other policies within the Local Plan will ensure that the~~is~~ effects of these are minimised as well as ensure that enhancements can be made. Gypsy and traveller sites are by their very nature low density development, but the Local Plan acknowledges the wide remit of housing that needs to be provided.

Recommendations:
Policy wording for H9 and H5 could make reference to Policy SP9. New gypsy and traveller sites (H8) could consider how air, noise and light pollution can be minimised for their sites and their surroundings and ensure the sites are integrated in terms of the surrounding community by making reference to Policies D6 and SP4.

7.9 Employment

The Policies included within **Table D-7** of **Appendix D** are as follows:

- E1: Protecting, strengthening and intensifying the Strategic Industrial Location~~Protecting existing economic and employment functions~~
- E2: Employment sites outside of Strategic Industrial Location ~~New B use class employment floorspace~~
- E3: Supporting small businesses and Start ups
- E4: Work-live units
- E5: Local access to training, employment and economic opportunities

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below.

7.9.1 Summary of Assessment

Old Oak and Park Royal has a significant existing employment base, with a range of businesses representing all types of sectors. The policies developed as part of the Local Plan seek to protect those

existing businesses where possible whilst also providing the physical space for new types of businesses and start-ups to be created and flourish. Park Royal is designated as a Strategic Industrial Location, and through the regeneration of the OPDC area, it is envisaged that not only can this continue, but also that new industries will be encouraged by this and attract inward investment into the area. The majority of effects against this policy topic is predicted to be positive. No major effects, either positive or negative, were predicted for Policy ~~E2,~~ E3 and E5. The environmental IIA objectives have tended to be predicted as neutral for this suite of policies, which is to be expected, though both a positive and negative impact about IIA objectives 7 – climate change (E1 and E2) in relation to its continued support of industrial activity ~~and~~ , 8 – waste (E1 and E2) as a net increase in economic growth would also result in a likely increase in waste generated, 10 (E1 and E2) through the potential loss of habitats as greenfield land is developed upon to accommodate economic expansion and 11 – pollution (E1 and E2) in relation to its continued support of current polluting uses. However, other policies within the Local Plan can serve to mitigate and improve the current situation.

Major positive effects are predicted for IIA Objective 16 - education and skills (E5), 17 - social and economic wellbeing (E1, E2, E3 and E5) and 18 – inward investment (E1). ~~A negative effect can be predicted against IIA objective 7 – minimise contributions to climate change (E1)~~. Policy E1 seeks to protect existing businesses, but a lot of the current floorspace and building stock may not be the most efficient in terms of considering energy efficiency.
~~Also, an intensification of industrial uses will need to mitigate against IIA objective 11 – pollution (E1 and E2) though it is envisaged that careful design of these new elements can help address this.~~

Recommendations:
Policy wording could be strengthened by making reference to Policy SP2. This can help ensure that current building stock seeks to address energy efficiency and reducing the impacts on climate change IIA objective 7.

7.10 Town Centre and Community Uses

The Policies included within **Table D-8** of **Appendix D** are as follows:

- TCC1: Locations for and impacts of town centre uses
- TCC2: Vibrancy
- TCC3: A-class uses
- TCC4: Social infrastructure
- TCC5: Culture and Art
- TCC6: Sports and Leisure
- TCC7: Public Houses
- TCC8: Catalyst Uses
- TCC9: Meanwhile Uses
- TCC10: Visitor Accommodation
- TCC11: Night-time economy uses

The detailed IIA of these individual policies together with recommendations for mitigation/enhancement measures is provided in **Appendix D**. A summary of the key IIA findings is presented below. Following on from the assessment as part of the Reg 18 consultation, the policies have been amended and altered to reflect the recommendations from the Regulation 18 IIA. TCC1, TCC3 and TCC4 are new policies that arose out of this consultation period. The Town Centre policies now include the Social Infrastructure elements assessed as part of the Regulation 18 Draft Local Plan.

7.10.1 Summary of Assessment

The aim of this policy section is to provide direction on how OPDC wishes that existing town centres and proposed ones will look in terms of their mix of use classes for shops, pubs and cafes/restaurants as well as how other social infrastructure such as schools, sports and cultural facilities will best serve existing and new

residents and visitors. The majority of effects against the policy component are predicted to be positive. No major negative effects were predicted against the IIA Objectives. Major positive effects are predicted for the IIA Objective 1 - place-making (TCC1, TCC2, TCC4, TCC9 and TC11), 3 - previously developed land (TCC8), 4 - minimise travel (TCC10), 13 - community and welfare (TCC2, TCC4 and TCC8), 15 - health and wellbeing (TCC5 and TCC6), 16 -education and skills (TCC4, TCC5 and TCC6), 17 - social and economic wellbeing (TCC1, TCC4, TCC5, TCC6 and TCC8) and 18 - inward investment TCC8, TCC9 and TCC111). Overwhelmingly this relates to addressing current access and affordability inequalities and the policies seek to address this, as well as considering how town centres within their wider context of public realm and in collaboration with forthcoming improved transport links can seek to improve the area overall.

Some uncertainty remains around IIA objective 8 – minimising waste and TCC1 and TCC4, 9 – water environment (all policies) and 14 – reduce crime (TCC10). Specific references are not made with regard to waste but it is assumed that the emphasis on high quality design will ensure waste collection and transport is considered. For IIA objective 9 – water environment, it is currently unclear whether the current water infrastructure will cope with additional capacity but it is envisaged that this can be dealt with in other policies.

Recommendations:
There were no recommendations proposed for any of the policies.

7.11 Delivery and Implementation

The Policies included within **Table D-9** of **Appendix D** are as follows:

- Policy DI1: Balancing priorities & securing infrastructure delivery
- Policy DI2: Timely delivery & optimised phasing
- Policy DI3: Stakeholder engagement & being a proactive planning authority
- Policy DI4: Planning powers & monitoring

The detailed IIA of these individual policies together is provided in Appendix D.

7.11.1 Summary of Assessment

This policy section seeks to seek clarity on how OPDC will deliver the scale of regeneration within its boundary and ensure that it is a successful endeavour. No negative effects were predicted against the IIA objectives. Positive effects are predicted for most of the IIA objectives and for the remainder, it is not envisaged that there are significant effects to be seen. The rationale behind this is that the policies seek to ensure that the other policies in the Local Plan can be delivered through appropriate funding mechanisms for developments coming forward as well as ensuring that the local community can feel empowered and contribute to the development of this new community. The aim of the policies is to ensure that the Local Plan as a whole can be delivered throughout its lifetime, as well as set up and ensure that lessons can be learnt along the way so that the OPDC as an authority can act promptly to maintain momentum on funding as well as elements such as housing targets.

Recommendations:
The policy supporting text can be strengthened to include the specific types of infrastructure provision that is intended to be secured.

7.12 Cumulative Effects

Table 7-1 Cumulative Effects

Receptor	Cumulative / Synergistic Effect	Causes	Potential Trend
Crime Rates and Fear of Crime	Crime and fear of crime may reduce in response to wider regeneration initiatives in	Regeneration provisions would also contribute to improved aspirations and environments in conjunction with the proposals in the Local	Positive

Receptor	Cumulative / Synergistic Effect	Causes	Potential Trend
	addition to the Local Plan provisions.	Plan. This may reduce crime and fear of crime levels in the long-term.	
Health of the Borough's population	Levels of health and well-being have the potential to improve in the long term.	Cumulative measures to promote walking and cycling together with co-location of jobs, homes and accessible greenspace can benefit healthy lifestyles and wellbeing.	Positive
Housing Provision	Housing will be provided to meet local needs and would contribute to regional targets.	The Local Plan would contribute to meeting local and regional housing needs.	Positive
Access to goods and services	Access to services and facilities for local people and visitors would be improved.	Sustainable accessibility across the area and connecting to the wider boroughs is a key feature of the Local Plan.	Positive
Sustainable Economic Growth	The Local Plan would help facilitate employment creation, business development and economic growth.	The efforts of all the policies would help to raise the image of the area and attract inward investment. The development of employment sites would help to meet regional needs.	Positive
Economic Inclusion	Promotion of employment in areas of high employment / income deprivation.	Improved accessibility within the area as a whole, with improved public transport and walking / cycling opportunities and co-location of jobs and homes, should ensure easy access to employment for all.	Positive
Biodiversity	The Local Plan seeks to ensure protection of biodiversity resources. However, potential negative impacts could occur as a result of development within brownfield sites and intensification of development in the area.	While the Local Plan seeks to encourage biodiversity enhancements, the overall quantum of development could have negative effects.	Positive and Negative
Townscape Quality	Protection and enhancement of landscape and townscape through regeneration of town centres and brownfield sites.	The Local Plan seeks to encourage the development of a significant brownfield site, which could lead to significant benefits against this objective.	Positive
Heritage Assets	Heritage assets would be directly affected by the Local Plan, and there is potential for undesignated heritage assets to be affected also.	Undesignated heritage assets should continue to be identified and a suitable strategy ~~developed~~ finalised ahead of the commencement of development, otherwise potentially negative effects could result.	Positive and Negative
Climate Change Air Quality Energy Efficiency Natural Resources Sustainable Transport	Potential negative effects of traffic growth, or positive effects from a reduction in congestion and improved connectivity. Potential negative and positive contributions towards climate change.	The Local Plan requires housing and employment growth which will all lead to an increase in resource use, emissions and traffic generation. However, the plan seeks to promote development near to existing centres and transport hubs and to promote sustainable travel modes. Energy projects relate to low-carbon sources of energy.	Positive and negative

Receptor	Cumulative / Synergistic Effect	Causes	Potential Trend
	Potential positive effects as a result of promotion of sustainable travel. The prudent use of natural resources.	Potential flood risk within the provision of specific measures to reduce this, could lead to significant cumulative negative effects.	

7.13 Habitats Regulations Assessment Screening

An initial HRA screening exercise, undertaken in parallel to this IIA, concludes the following:

> *This HRA Screening of the OPDC Regulation 19(2) Second Revised Draft Local Plan has considered the potential implications of the plan for European designated sites within 20 km of the OPDC area boundary.*
>
> *It is important to note that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites.*
>
> *It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan could be reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European designated sites through habitat degradation and increased recreational pressure.*
>
> *However, the closest European designated site is more than 7 km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European designated sites and the nature of the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).*
>
> *The assessment of in-combination effects of various plans and policies revealed that it is not considered that the OPDC Local Plan would contribute to significant in-combination effects, primarily due to the distance of the plans, policies and projects from the European designated sites.*
>
> *It has therefore been concluded that the OPDC Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.* ***As such, it is not proposed to undertake Appropriate Assessment.***

8 Proposed SA Monitoring Framework

8.1 Introduction

This section provides a proposed framework for monitoring the significant effects of implementing the plan. Monitoring is an ongoing process integral to the plan's implementation and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any unforeseen, undesirable environmental effects are identified and remedial action is implemented accordingly. Likewise, it is beneficial to check that the effects (including beneficial ones) occur as predicted by the SA.

Based on the assessment conducted on the options and identification of potential significant environmental effects, a proposed monitoring framework has been drafted. Monitoring will be undertaken following adoption of the Local Plan and should be linked back to the OPDC's own Authority Monitoring Report. OPDC have confirmed that these will be used to inform the development of indicators for monitoring the Local Plan.

8.2 Approach

The proposed monitoring framework has been developed to measure the performance of the plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The monitoring framework has been designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the plan, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the borough. This enables the measurement of the overall effects of the plan.

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore, be important.

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. OPDC, as a newly set up authority, are still developing and refining their toolkit for monitoring the effects of their Local Plan.

Consideration has, therefore, been given to the Authority Monitoring Report that will be used to monitor delivery of the plan policies. OPDC will need to consider these proposed components in the development of their Authority Monitoring Report now and throughout the life of the plan. It may be that indicators deemed unquantifiable at this point will be developed in the future. As such, the indicators suggested overleaf are recommended but subject to change.

8.3 Proposed Monitoring Framework

Table 8-1 provides a framework for monitoring the effects of the plan and determining whether the predicted sustainability effects are realised. The framework is structured using the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty;
- A possible monitoring indicator with a potential source for the data identified and
- A target (where one has been devised).

The impacts predicted in the SA will not be realised until development occurs. The proposed monitoring framework presented in Table 8-1 can then be updated to include targets as and when they are developed.

Table 8-1 Outline Monitoring Framework

IIA Objective	Effect to be Monitored	Possible Indicators	Targets (to be refined and developed further once the Plan is adopted)	Potential Data Sources
To enhance the built environment and encourage 'place-making'	Proportion of accessible open spaces Proportion of new development incorporating an appropriate level of open space for recreation	• Provision of publicly accessible open space in accordance with the London Plan Categorisation • Number of new buildings and public spaces designed to be Equalities Act compliant • Proportion of new development incorporating Lifetime Neighbourhoods principles • Occupant satisfaction with the design and amenity of completed schemes • Proportion of new development using technology to improve legibility	Deliver 30% land as publicly accessible open space	OPDC Planning Team Performance Monitoring Framework & AMR
To optimise the efficient use of land through increased development densities and building heights, where appropriate	Effects of high density developments	• Density of development	Increase percentage of homes in most areas with the exception of SIL	OPDC Planning Team Performance Monitoring Framework & AMR
Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	Quality of soil resources	• Amount of soil remediated on site	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR Any site wide Remediation Strategy for OPDC

Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	Effects of the plan on service provision and accessibility of key services for the population across the borough.	• Distribution of major transport systems – roads, rail links • Modal shift of existing travel patterns versus future travel patterns • Connectivity of the cycling and walking network • Km of designated cycling and walking routes • Proportion of goods arriving and leaving the area by rail in comparison to road • Proportion of waste and freight arriving and leading the area by canal. • Proportion of shared spaces within the urban environment • Controlled parking zones, car clubs and travel plan measures implemented • Number of accessible public transport interchanges and bus stops (source: Equal Life Chances for All 2009) • Number of local businesses negatively affected by construction activities • Increase in traffic on the highway network in and around the OPDC area	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR Index of Multiple Deprivation
Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local and regional needs	Effects of the plan on access to housing across the borough.	• Dwelling Stock (Office for National Statistics Local Profiles). • Household density (Office for National Statistics Local Profiles) • Proportion of LSOAs in the bottom 10% for housing deprivation	Targets to be developed	Index of Multiple Deprivation OPDC Planning Team Performance Monitoring Framework & AMR

		• Proportion of dwellings that meet internal space standards • Proportion of dwellings with a high SAP rating • Proportion of the population considered to be homeless (source: Equal Life Chances for All 2009) • Amount of family size housing (source: Equal Life Chances for All 2009) • Proportion of single parent families living in unsuitable accommodation • Amount of affordable housing (source: Equal Life Chances for All 2009) • Amount of Lifetime Homes (source: Equal Life Chances for All 2009) • Proportion of market, affordable and specialist housing delivered.		
Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	Effects of the development plan on ensuring climate change adaption is incorporated into new developments.	• River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009). • Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map) • Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map) • Proportion of energy usage in buildings using sustainable design compared with standard construction	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR

To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	Effects of the development plan on ensuring energy efficiency in new developments and achievement of sustainable construction standards in new developments.	• Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles) • All energy consumption by sector (Office for National Statistics Local Profiles and DECC) • Energy consumption per capita • Proportion of properties generating energy from low or zero carbon sources, including solar. • Proportion of new developments incorporating district heating or heat pumps • Greenhouse gas emissions per capita compared with London and national averages • Proportion of journeys made by non-motorised transport • Proportion of energy generated from low, zero or negative carbon energy sources	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	Effects on reducing travel and promoting use of public transport	• Number of active / historic landfills on the site (Environment Agency) • Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles) • Amount of residual waste per household (ONS) sent to landfill or incineration • Amount of commercial and industrial waste produced (Defra)	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR

		• Amount of waste recycled and re-used within the area • Amount of waste transported within the area		
Improve the quality of the water environment	Monitor the effect of new development on flood risk, the number of new developments that include SuDS and the effects of new development on water quality across the borough.	• Water and groundwater quality (Environment Agency) • Development of a site wide drainage strategy • Water consumption per capita • Increase in infrastructural capacity as a proportion of new development • Increased use of existing infrastructure	Targets to be developed	Water Framework Directive Environment Agency OPDC Planning Team Performance Monitoring Framework & AMR
Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	Monitor effects of new development on biodiversity assets across the borough. Opportunity for new features to be provide as part of new development e.g. wetlands, landscaping etc.	• Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). • Key Biodiversity Action Plan (BAP) species and habitats present (London BAP) • Protected species with favourable conservation status • Habitat connectivity • Condition of Wormwood Scrubs Local Nature Reserve	Targets to be developed	London BAP OPDC Planning Team Performance Monitoring Framework & AMR Natural England

		• Condition of Grand Union Canal area of nature conservation • Increase in areas of greenspace for biodiversity including inaccessible areas		
To minimise air, noise and light pollution, particularly for communities and vulnerable groups	Effect of the plan and new development on air quality across the borough.	• Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive13) • Number of new local air quality monitoring points • Ill health attributed to air, noise or light pollution • Proportion of the population affected by high levels of noise during construction and post construction including a breakdown by equality group • Proportion of the population affected by light pollution from traffic or industry during construction and post construction including a breakdown by equality group • Proportion of population living within areas with regular exceedances in NOx and particulates	Targets to be developed	UK Air Quality Strategy
To conserve and enhance the historic environment, heritage assets and their settings	Protection afforded to the borough's heritage assets through application of the plan's policies.	• Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens (www.magic.gov.uk).	Reduce number of heritage assets at risk and list where appropriate	OPDC Planning Team Performance Monitoring Framework & AMR Historic England

[13] http://uk-air.defra.gov.uk/aqma/maps

		• Decrease in the number of Heritage Assets at Risk in and around the area • Increase in the number of heritage assets identified and protected through the development of Local List • Increase in the number of heritage assets highlighted and enhanced or utilised for place-making and interpretation • Development of a local views strategy and proportion of new developments adhering to its principles • Increase in the number of heritage assets re-used for development		
Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	Effect of plan on contributing to increasing community cohesion and reducing social exclusion	• Number of offices converted to residential under permitted development rights • Schemes to reduce the impact of construction on the local community • Connectivity of pedestrian linkages across the area	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
Improve safety and reduce crime and the fear of crime	Effect of plan on contributing to a reduction in crime levels. Number of new developments incorporating Secure by Design Principles	• Crime rates (Indices of Deprivation) • Road traffic accidents and diversity profiling (source: Equal Life Chances for All 2009) • Percentage of people who feel that there is less discrimination in their neighbourhood than 3 years ago (source: Equal Life Chances for All 2009) • Percentage of the local population who feel personal safety on buses, tubes and	Targets to be developed	Index of Multiple Deprivation

		trains (source: Equal Life Chances for All 2009) • Percentage of women who feel safe using local bus, tube, trains, black cabs, and mini cabs at night, alone (source: Equal Life Chances for All 2009) • Proportion of developments incorporating Secured by Design principles		
Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	Monitor levels of health and well-being across the borough. The implementation of the plan policies has the potential to improve the green infrastructure network, improve accessibility and provide opportunities for residents to pursue healthy lifestyles. Conversely there may also be risk of loss of areas of open space as a result of new development and increased pressure on health services.	• Health Deprivation and Disability (Indices of Deprivation for England 2010) • Proportion of the population living within walking distance of health care facilities • Proportion of the population living within walking distance of education facilities • Proportion of the population living within walking distance of social care facilities • Proportion of the population living within walking distance of community facilities • Proportion of the population with access to space for the growing of food locally • Increase in the capacity of local social infrastructure • Childhood obesity rates • Life expectancy	Targets to be developed	Index of Multiple Deprivation Office of National Statistics OPDC Planning Team Performance Monitoring Framework & AMR
To improve the education and skills levels of all members of the population, particularly vulnerable groups	Effect of plan on ensuring access to educational opportunities Ensuring that sufficient primary and secondary school capacity is available to accommodate new	• Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).	Targets to be developed	Index of Multiple Deprivation OPDC Planning Team Performance Monitoring Framework & AMR

	residents	• Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). • Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). • Proportion of the population with access to appropriate education facilities by sustainable transport modes • Decrease in educational underachievement gap between disadvantaged groups and the wider community (source: Equal Life Chances for All 2009)		
Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	Effects development will have to maximise the social and economic wellbeing of the local and regional population.	• Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010) • Proportion of new employment and training opportunities being awarded to local people via local procurement arrangements • Proportion of new employment and training opportunities being awarded to local women via local procurement arrangements	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR
To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	Effects development will have on encouraging inward investment.	• Economy Local Profiles (ONS) • Employment by industry (ONS- NOMIS) • Proportionate coverage of broadband across the area	Targets to be developed	OPDC Planning Team Performance Monitoring Framework & AMR

		• Proportion of new employment development that includes an element of affordable workspace • New businesses categorised as 'health-led' • New businesses that contribute to the growth of the low carbon goods and services sector • Amount of new employment floorspace in Old Oak • Amount of new industrial floorspace in Park Royal		

9 Next Steps

This IIA Report has now been~~-~~ updated to reflect the outcome of the Regulation 19(1) consultation of the Draft Local Plan and includes the assessment of the OPDC revisions set out in ~~to~~ the Second Revised~~the~~ Draft Local Plan. This IIA Report and appendices have~~s~~ now been issued for consultation alongside the Regulation 19(2) Second Revised Draft Local Plan to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, OPDC will review the feedback and revise the Plan as appropriate.

If you would like to comment on this IIA Report, please send comments to:

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APPENDIX A

Review of Plans, Programmes and Environmental Protection Objectives

Table A-1 Sustainability Themes derived from the review of Policies, Plans and Programmes

Common theme Environment	PPPs Reviewed International/ National	Regional / London	West London/Local
Promote sustainable design and mitigate and adapt to climate change	• Climate change Act 2008 • UK Climate Change Programme 2006 • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • National Planning Policy for Waste 2014 • Written Ministerial Statement: Sustainable Drainage Systems 2014	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • London Infrastructure Plan 2050 update 2015 • Sustainable Design and Construction SPG 2014 • The Mayor's Food Strategy 2008 • The Mayor's Climate Change Mitigation and Energy Strategy 2011 • The Mayor's Climate Change Adaption Strategy 2011 • London Plan Town Centres SPG 2014	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Ealing Sustainable Community Strategy 2006-2016 • Kensington and Chelsea Consolidated Local Plan 2015
Promote and protect the water environment including issues such as quality and resource use as well as reducing flood risk	• Water Framework Directive 2000/60/EC • Urban Waste Water Treatment Directive 91/271/EEC • Flood and Water Management Act 2010 • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • Future Water 2011 • National Planning Policy for Waste 2014 • Written Ministerial Statement: Sustainable Drainage Systems 2014	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • London Infrastructure Plan 2050 update 2015 • Sustainable Design and Construction SPG 2014 • Securing London's Water Future 2011 • Thames River Basin District RBMP 2009 •	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Hammersmith and Fulham Updated Surface Water Management Plan 2015 • Kensington and Chelsea Surface Water Management Plan 2014 • Kensington and Chelsea Local Flood Risk Management Strategy 2015 • Kensington and Chelsea Consolidated Local Plan 2015 •
Reduce greenhouse gas emissions, increase energy efficiency and promote the use of renewable energy and renewable technologies in	• Directive on the Promotion of the Use of Energy from Renewable Sources 2209/28/EC • Energy Act 2013 • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005	• The London Plan 2011, 2013, 2015 • Sustainable Design and Construction SPG 2014 • The Mayor's Climate Change Mitigation and Energy Strategy 2011 • The Mayor's Climate Change Adaption Strategy 2011	• • Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Ealing Sustainable Community Strategy 2006-2016

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
appropriate locations	• The UK Low Carbon Transition Plan 2009 • The Carbon Plan 2011 • UK Renewable Energy Strategy 2009 • National Planning Policy for Waste 2014	• London Infrastructure Plan 2050 update 2015 • • •	• Kensington and Chelsea Consolidated Local Plan 2015 • • • •
Promote sensitive waste management	• Waste Framework Directive 2008/98/EC • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • National Planning Policy for Waste 2014 •	• The London Plan 2011, 2013, 2015 • Sustainable Design and Construction SPG 2014 • The Control of Dust and Emissions during Construction and Demolition SPG 2014 • London Waste and Recycling Board Waste Management Planning Advice for New Flatted Properties, 2014 • The Mayor's Municipal Waste Management Strategy, 2011 • London Infrastructure Plan 2050 update 2015	• West London Joint Waste Plan 2015 • Ealing Sustainable Community Strategy 2006-2016 • Kensington and Chelsea Consolidated Local Plan 2015 •
Protect and enhance the historic environment and recognise and recognise and appreciate landmarks, townscapes and their setting	• European Convention on the Protection of the Archaeological Heritage (revised) (1992) • European Landscape Charter 2000 • Planning (Listed Building and Conservation Areas) Act 1990 • Ancient Monuments and Archaeological Areas Act 1979 • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005	• The London Plan 2011, 2013, 2015 • London View Management Framework SPG 2012 • London Plan Town Centres SPG 2014 • • • •	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Ealing Green Space Strategy 2012-2017 • Kensington and Chelsea Consolidated Local Plan 2015 • •
Conserve and enhance biodiversity as an integral part of economic, social and environmental development	• European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats • Wildlife and Countryside Act 1981 • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • UK Post-2010 Biodiversity Framework 2012	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • Mayor's Biodiversity Strategy 2002 • London Biodiversity Action Plan 2001 • London Infrastructure Plan 2050 update 2015	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Kensington and Chelsea Consolidated Local Plan 2015

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
Achieve more effective geoconservation and improve soil quality	• National Planning Policy for Waste 2014	• London's Foundations Protecting the Geodiversity of the Capital 2012 • The Mayor's Food Strategy 2008	• Food Growing and Allotments Strategy for Brent 2014/16 • Hammersmith and Fulham Contaminated Land Strategy 2001
Optimise the use of land through increasing the density of development		• The London Plan 2011, 2013, 2015	•
Improve air quality	• EU Directive on Ambient Air Quality and Management 96/62/EC • National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • UK Air Quality Strategy 2011	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • Mayors Air Quality Strategy 2010 • The Control of Dust and Emissions during Construction and Demolition SPG 2014 • London Plan Town Centres SPG 2014 •	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Kensington and Chelsea Consolidated Local Plan 2015 •
Minimise the adverse impacts of noise on people living and working in, and visiting the area	• European Directive: Environmental Noise Directive 2002/49/EC • National Planning Policy Framework 2012 • Noise Policy Statement for England 2010	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • The Mayor's Ambient Noise Strategy 2004 • London Plan Town Centres SPG 2014	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • St Quintin and Woodlands Draft Neighbourhood Plan 2015
Social			
Improve health and well-being and promote greater	• Health for Growth 2014-2020 • National Planning Policy Framework 2012	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012	• Brent Core Strategy 2010 • Ealing Core Strategy 2012

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
levels of physical activity	• Sustainable Development Strategy 2005 • Health Lives, Healthy People 2011 • National Planning Policy for Waste 2014	• Social Infrastructure SPG 2015 • The Control of Dust and Emissions during Construction and Demolition SPG 2014 • Draft Housing SPG 2015 • Sustainable Design and Construction SPG 2014 • Play and Informal Recreation SPG 2012 • The Mayor's Food Strategy 2008 • The London Health Inequalities Strategy 2010 • Improving Londoners Access to Nature 2008 • London Infrastructure Plan 2050 update 2015 • London Plan Town Centres SPG 2014	• Hammersmith and Fulham Core Strategy 2011 • Brent Parks Strategy 2010-2015 • Food Growing and Allotments Strategy for Brent 2014/16 • Brent Draft Community Safety Strategy 2014-17 • Brent Health and Wellbeing Strategy 2014-17 • A Plan for Children and Families in Brent 2012-2015 • Ealing Quality of Life for Older People 2006-2016 • Ealing Green Space Strategy 2012-2017 • Hammersmith and Fulham Health and Wellbeing Strategy 2013-15 • Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018 • Hammersmith and Fulham CSPAN Physical Activity Strategy 2011 • Ealing Sustainable Community Strategy 2006-2016 • Kensington and Chelsea Consolidated Local Plan 2015
To create an equal society which recognises people's different needs, situations and goals, and removes the barriers that limit what people can do and be	• Equality Act 2010 • National Planning Policy Framework 2012 •	• The London Plan 2011, 2013, 2015 • Sustainable Design and Construction SPG 2014 • Social Infrastructure SPG 2015 • Play and Informal Recreation SPG 2012 • The Mayor's Food Strategy 2008 • The London Health Inequalities Strategy 2010 • Planning for Equality and Diversity in London SPG 2007 • Improving Londoners Access to Nature 2008 • The Mayor's Equality Framework 2009 •	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Brent Equality Strategy 2015-19 • A Regeneration Strategy for Brent 2010-2030 • A Plan for Children and Families in Brent 2012-2015 • Ealing Quality of Life for Older People 2006-2016 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 • Ealing Sustainable Community Strategy 2006-2016 • St Quintin and Woodlands Draft Neighbourhood Plan 2015

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
Maximise the contribution that the arts, culture and heritage can make to the community		• The London Plan 2011, 2013, 2015 • Play and Informal Recreation SPG 2012 • Social Infrastructure SPG 2015 • The Mayor's Food Strategy 2008 • The Mayor's Culture Strategy 2014 • Shaping Neighbourhoods: Character and Context 2014 • London Plan Town Centres SPG 2014 •	• Food Growing and Allotments Strategy for Brent 2014/16 • Cultural Strategy for Brent 2010-15 • Ealing Arts and Cultural Strategy 2013-2018 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 • Ealing Sustainable Community Strategy 2006-2016 • Kensington and Chelsea Consolidated Local Plan 2015 • Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012 • St Quintin and Woodlands Draft Neighbourhood Plan 2015
The need to ensure that new housing development meets local needs (for all sections of society)	• National Planning Policy Framework 2012 • Planning Policy for Traveller Sites 2015 •	• The London Plan 2011, 2013, 2015 • Draft Housing SPG 2015 • Sustainable Design and Construction SPG 2014 • London Infrastructure Plan 2050 update 2015 • London Plan Town Centres SPG 2014 • •	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Ealing Quality of Life for Older People 2006-2016 • Hammersmith and Fulham Housing Strategy 2015 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 • Ealing Sustainable Community Strategy 2006-2016 • Kensington and Chelsea Consolidated Local Plan 2015 • Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012 • St Quintin and Woodlands Draft Neighbourhood Plan 2015
Promote more sustainable transport choices and to improve accessibility	• National Planning Policy Framework 2012 • Sustainable Development Strategy 2005 • •	• The London Plan 2011, 2013, 2015 • Land for Industry and Transport SPG 2012 • Mayor's Transport Strategy 2010 • London Infrastructure Plan 2050 update 2015 • London Plan Town Centres SPG 2014	• West London Sub Regional Transport Plan 2010 • Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
		•	• Park Royal Southern Gateway Position Statement 2008 • Kensington and Chelsea Consolidated Local Plan 2015 • Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012 • St Quintin and Woodlands Draft Neighbourhood Plan 2015
Recognise the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life	• National Planning Policy Framework 2012 •	• The London Plan 2011, 2013, 2015 • Green Infrastructure and Open Environments SPG 2012 • Social Infrastructure SPG 2015 • Play and Informal Recreation SPG 2012 • The Mayor's Food Strategy 2008 • Improving Londoners Access to Nature 2008 • London Infrastructure Plan 2050 update 2015	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Brent Parks Strategy 2010-2015 • Food Growing and Allotments Strategy for Brent 2014/16 • Ealing Green Space Strategy 2012-2017 • Hammersmith and Fulham Parks and Open Spaces Strategy 2008-2018 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 • St Quintin and Woodlands Draft Neighbourhood Plan 2015
Improve educational attainment and training opportunities	• Policy statement: Planning for schools development 2011 • National Planning Policy Framework 2012 •	• The London Plan 2011, 2013, 2015 • Social Infrastructure SPG 2015 • London Infrastructure Plan 2050 update 2015	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Ealing Sustainable Community Strategy 2006-2016
Reduce crime and fear of crime	• National Planning Policy Framework 2012 •	• The London Plan 2011, 2013, 2015 • Sustainable Design and Construction SPG 2014 • Social Infrastructure SPG 2015 • Play and Informal Recreation SPG 2012	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • Brent Draft Community Safety Strategy 2014-17 • Ealing Sustainable Community Strategy 2006-2016

Common theme	PPPs Reviewed International/ National	Regional / London	West London/Local
Economic			
Promote sustainable economic development and a range of employment opportunities	• National Planning Policy Framework 2012 • Sustainable Development Strategy 2005	• The London Plan 2011, 2013, 2015 • Land for Industry and Transport SPG 2012 • The Mayor's Economic Development Strategy 2010 • London Infrastructure Plan 2050 update 2015 • London Infrastructure Plan 2050 update 2015	• Brent Core Strategy 2010 • Ealing Core Strategy 2012 • Hammersmith and Fulham Core Strategy 2011 • A Regeneration Strategy for Brent 2010-2030 • Old Oak and Park Royal draft Opportunity Area Planning Framework 2015 • Ealing Sustainable Community Strategy 2006-2016 • Park Royal Southern Gateway Position Statement 2008 • Kensington and Chelsea Consolidated Local Plan 2015 • Kensington and Chelsea Issues and Options Paper for Kensal Gasworks 2012

Figure A-1 – Hammersmith and Fulham Core Strategy 2011: Key Diagram

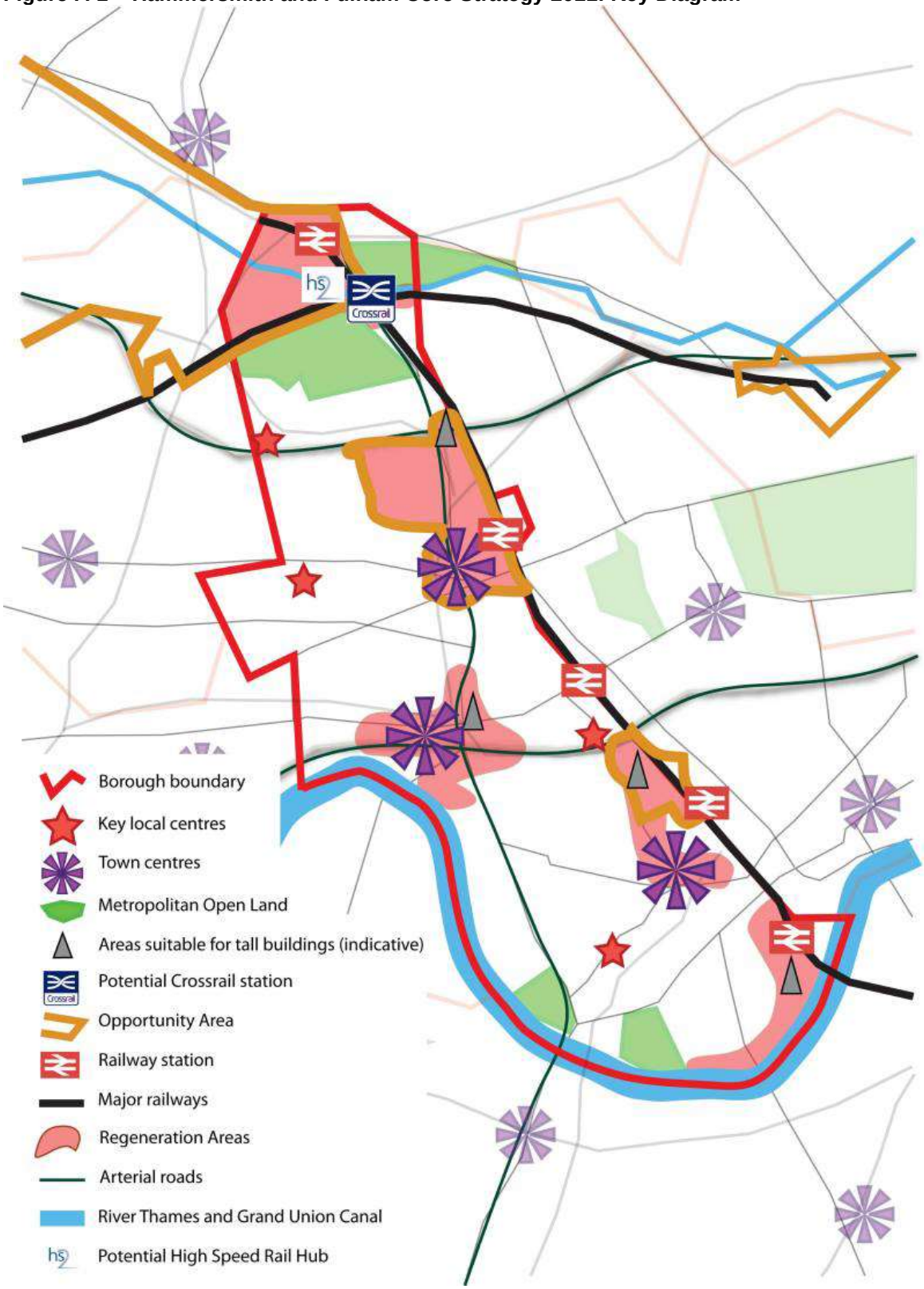


Figure A-2 – Ealing Core Strategy 2012: Key Diagram

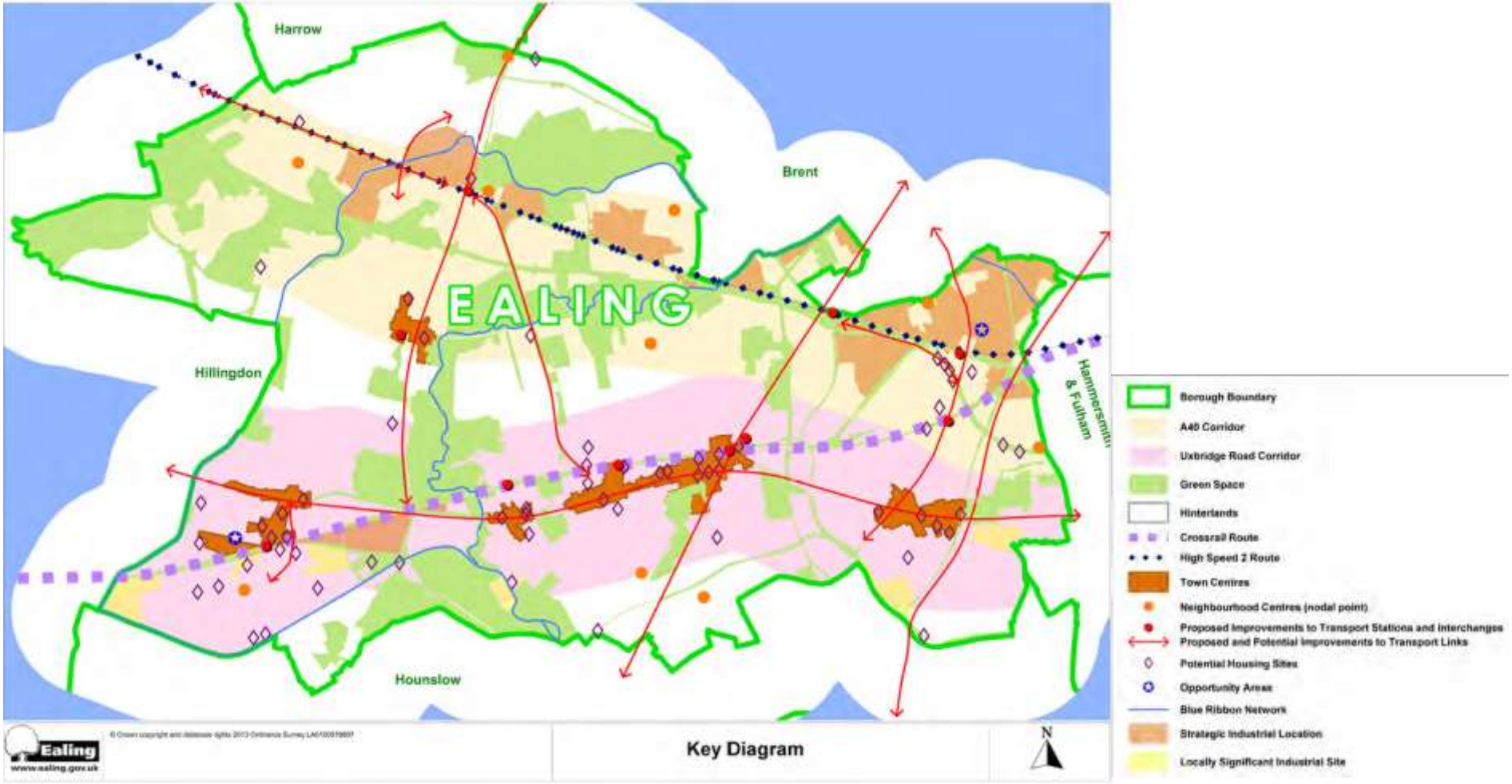


Figure A-3 – Brent Core Strategy 2010: Key Diagram

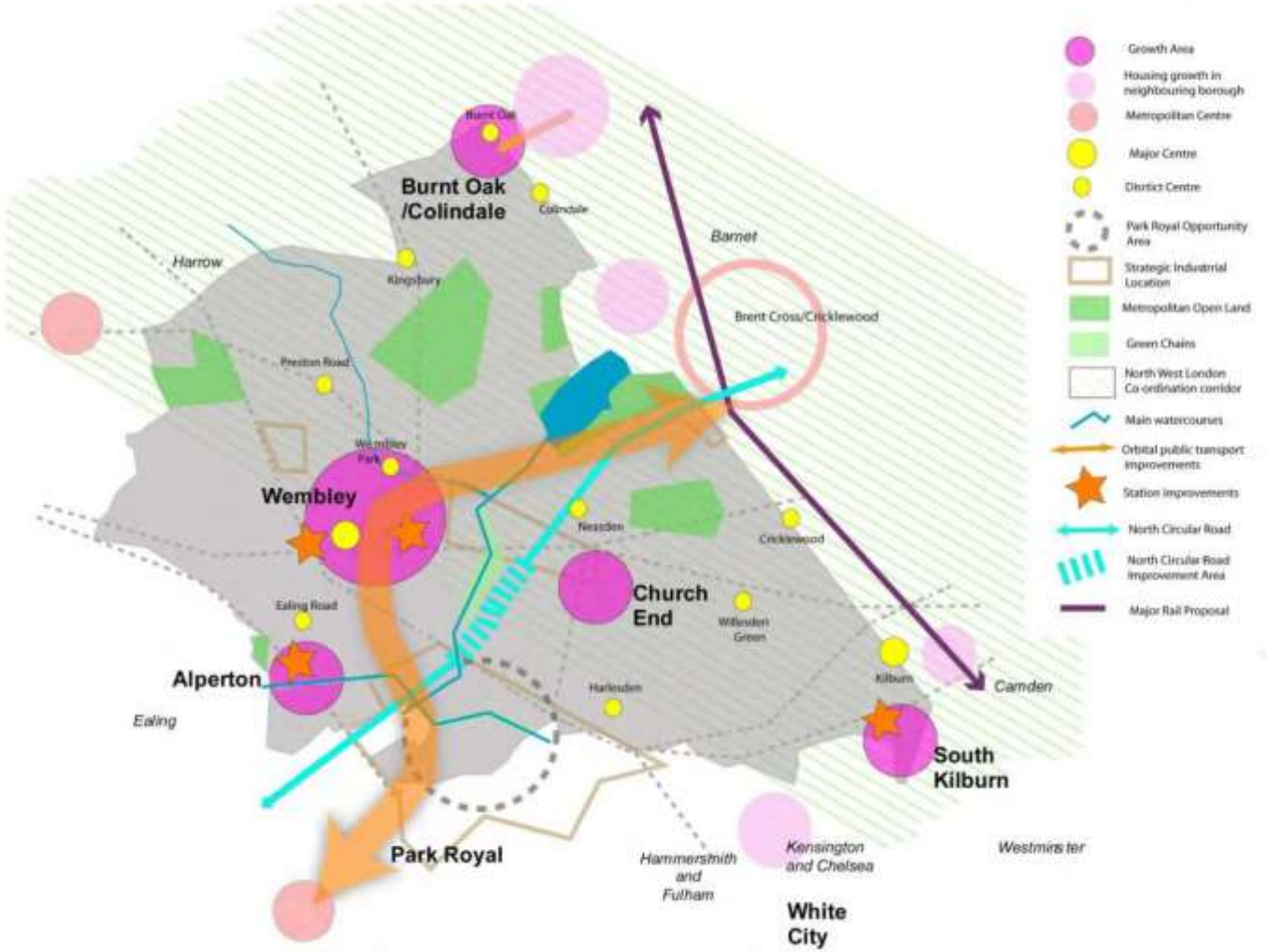
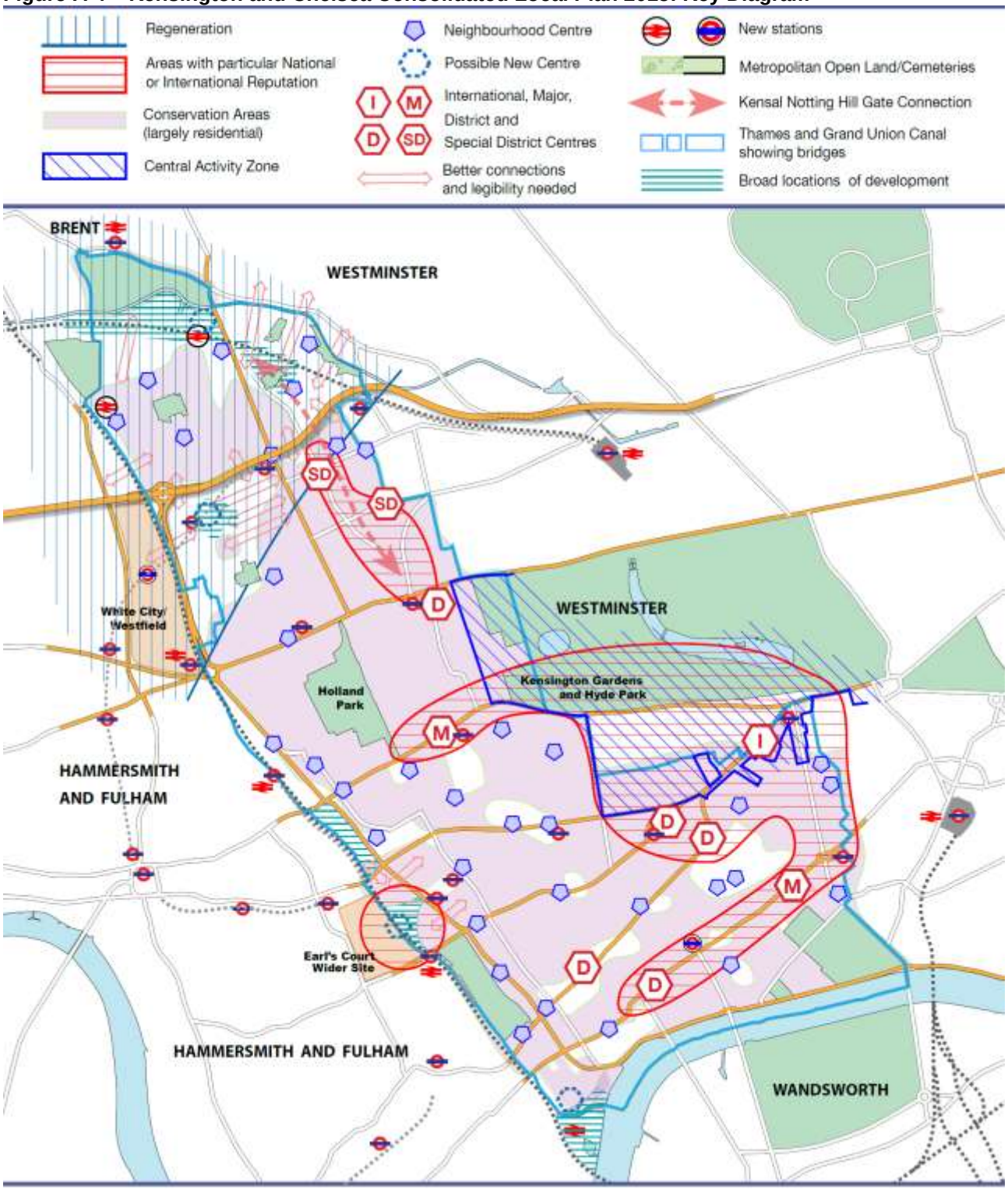


Figure A-4 – Kensington and Chelsea Consolidated Local Plan 2015: Key Diagram



APPENDIX B

Baseline Data

B. The Sustainability Baseline and Key Sustainability Issues

B.1 Population

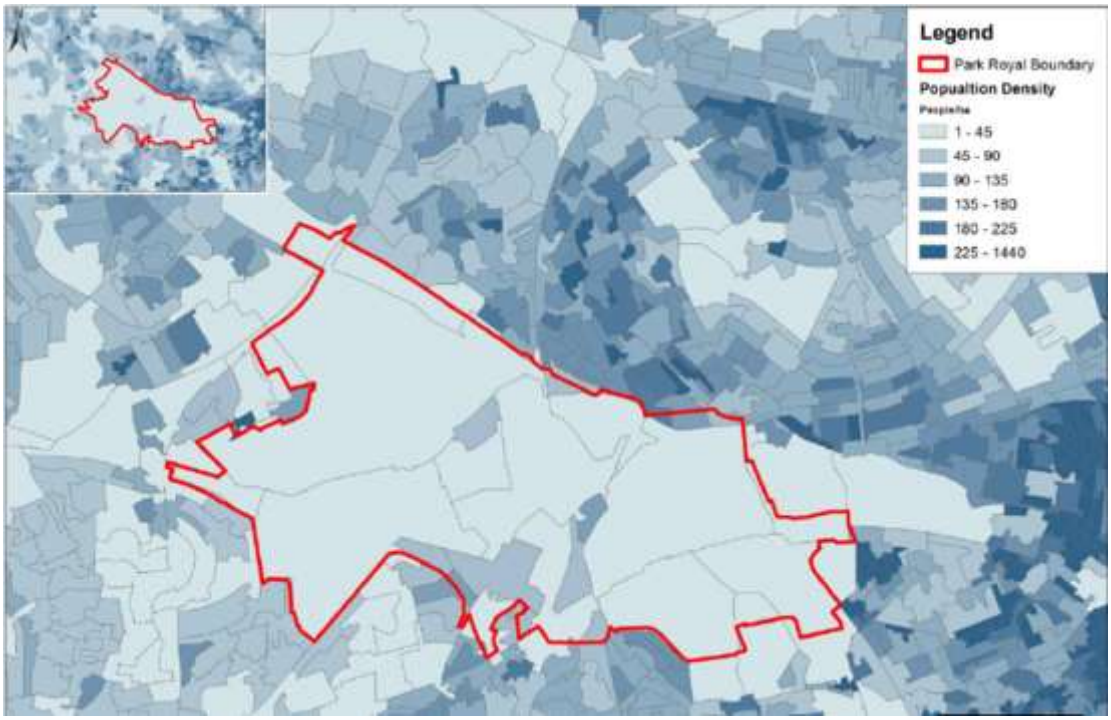
The following baseline indicators have been used to identify key population trends and characteristics:

- Total population (2011 Census and Neighbourhood Statistics[1]).
- Area of Ealing, Brent and Hammersmith & Fulham (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Office for National Statistics Local Profiles).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).
- Faith communities represented in the population (OAPF Draft IIA Report, GLA, February 2015)
- Gender balance and pay gap (OAPF Draft IIA Report, GLA, February 2015)

B.1.1 OPDC Area

The population of OPDC is just under 5,000 people contained in 1,898 households. **Figure B1-1** indicates the population density of the area.

Figure B1-1 Comparative Population Density



Source: OAPF Draft IIA Report, GLA, February 2015

The OPDC area covers some 650 hectares and due to its predominantly industrial nature has a much lower population density than its adjoining boroughs. Given the proposed minimum new homes of 25,500 this density is set to change. This influx of future population needs careful management to ensure inequalities don't worsen throughout the area and adjoining boroughs.

Figure B1-2 Age profile

Area	Total	Male	Female	Age 0-4	Age5-17	Age 18-24	Age 25-64	Age 65-84	Age 85 +
England & Wales	56,075,912	49.2%	50.8%	6.2%	15.1%	9.4%%	52.8%	14.2%	2.2%
England	53,012,456	49.2%	50.8%	6.3%	15.1%	9.4%	52.9%	14.1%	2.2%
London	8,173,941	49.3%	50.7%	7.2%	14.9%	10.0%	56.7%	9.6%	1.5%
Inner London	3,231,901	49.8%	50.2%	7.0%	13.3%	11.4%	59.7%	7.5%	1.1%
Outer London	4,942,040	49.1%	50.9%	7.4%	16.0%	9.2%	54.7%	10.9%	1.8%
Ealing	338,449	50.0%	50.0%	7.5%	15.1%	9.3%	57.4%	9.3%	1.4%
Brent	311,215	50.3%	49.7%	7.2%	15.4%	10.1%	56.8%	9.3%	1.2%
Hammersmith and Fulham	182,493	48.7%	51.3%	6.5%	11.3%	11.4%	61.8%	7.9%	1.1%
Park Royal & Old Oak	4,941	51.2%	48.8%	8.0%	14.2%	12.5%	59.3%	5.6%	0.5%

Source: Census 2011

As shown in **Figure B1-2**, the OPDC area contains a large proportion of working age adults and a smaller population of ages 65+ than the surrounding boroughs. Careful consideration should be given to the wider

population trend of an ageing population as well ensuring an attractive area for young adults and those who may be looking to raise a family.

Figure B1-3 Components of population change

Components of population change

mid-2011 to mid-2012

	Live births	Deaths	Natural change	Net migration & other changes	Total change
	Thousands	Thousands	Thousands	Thousands	Thousands
Brent	5.3	1.6	3.8	-1.3	2.4
Hammersmith and Fulham	2.7	0.9	1.8	-4.4	-2.6
Ealing	5.7	1.9	3.8	-2.5	1.4
London	134.0	47.6	86.5	17.5	104.0

Source: ONS Local Profiles

Although there is a net loss of population from Brent, Ealing and Hammersmith & Fulham, there is a continued influx of people into London and this needs to be addressed as part of the area's redevelopment proposals.

The population of OPDC is ethnically diverse. Data indicates that 21.6% of the population were White British, with 18.6% identifying themselves as White Other (**Table B1-4**). Black African or Black Others are the main ethnic minority within OPDC, representing 24% of the population

.

Table B1-4 Percentage of population by ethnic group

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
White British	80.5%	79.8%	44.9%	38.4%	49.2%	30.4%	18.0%	44.9%	21.6%
White Irish	0.9%	1.0%	2.2%	2.3%	2.0%	3.1%	4.0%	3.5%	2.5%
White Gypsy Irish Traveller	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.6%
White Other White	4.4%	4.6%	12.6%	16.5%	10.1%	15.4%	14.3%	19.6%	18.6%
Mixed White and BlackCaribbean	0.8%	0.8%%	1.5%	1.8%	1.3%	1.2%	1.4%	1.5%	1.6%
Mixed White BlackAfrican	0.3%	0.3%	0.8%	1.0%	0.7%	0.6%	0.9%	0.8%	2.0%
Mixed WhiteAsian	0.6%	0.6%	1.2%	1.3%	1.2%	1.4%	1.2%	1.5%	1.4%
Mixed OtherMixed	0.5%	0.5%	1.5%	1.8%	1.2%	1.3%	1.6%	1.7%	2.1%
Asian Indian	2.5%	2.6%	6.6%	3.4%	8.8%	14.3%	18.6%	1.9%	5.3%
Asian Pakistani	2.0%	2.1%	2.7%	1.9%	3.3%	4.3%	4.6%	0.9%	2.0%
Asian Bangladeshi	0.8%	0.8%	2.7%	5.1%	1.2%	0.5%	0.6%	0.6%	0.6%
Asian Chinese	0.7%	0.7%	1.5%	2.0%	1.2%	1.2%	1.0%	1.7%	3.0%
Asian Other Asian	1.5%	1.5%	4.9%	3.6%	5.7%	9.3%	9.2%	4.0%	5.6%
Black African	1.8%	1.8%	7.0%	8.6%	6.0%	5.1%	7.8%	5.8%	12.3%
Black Caribbean	1.1%	1.1%	4.2%	5.4%	3.5%	3.9%	7.6%	3.9%	8.2%
Black Other Black	0.5%	0.5%	2.1%	2.8%	1.6%	1.9%	3.4%	2.1%	3.5%
Other Arab	0.4%	0.4%	1.3%	1.6%	1.1%	2.9%	3.7%	2.9%	5.8%
Other Other	0.6%	0.6%	2.1%	2.6%	1.9%	3.1%	2.1%	2.7%	3.2%
Total	56,075,912	53,012,456	8,173,941	3,231,901	4,942,040	338,449	311,215	182,493	4,941

Source: Census 2011

The largest religious community in the OPDC area is Christian at 48.7%, which is higher than the London average of 48.4%, but lower than the English average of 59.4%. This is followed by Muslim at 21.7%, compared to a London average of 12.4% and an English average of 5%. Within the plan area, 14.6% stated no religion, which is lower than the London average of 20.7% and English average of 24.7%. Other minorities include Hindu (3.9%), Buddhist (1.4%), Sikh (1.2%), other religion (0.8%) and Jewish (0.3%).

Table B1-5 Percentage of population by religion

Area	Total	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Religion not stated
England & Wales	56,075,912	59.3%	0.4%	1.5%	0.5%	4.8%	0.8%	0.4%	25.1%	7.2%
England	53,012,456	59.4%	0.5%	1.5%	0.5%	5.0%	0.8%	0.4%	24.7%	7.2%
London	8,173,941	48.4%	1.0%	5.0%	1.8%	12.4%	1.5%	0.6%	20.7%	8.5%
Inner London	3,231,901	45.4%	1.1%	2.2%	1.6%	14.4%	0.5%	0.5%	23.9%	10.4%
Outer London	4,942,040	50.4%	0.9%	6.9%	1.9%	11.1%	2.3%	0.7%	18.6%	7.2%
Ealing	338,449	43.7%	1.2%	8.5%	0.3%	15.7%	7.9%	0.6%	15.0%	6.9%
Brent	311,215	41.5%	1.4%	17.8%	1.4%	18.6%	0.5%	1.2%	10.6%	6.9%
Hammersmith and Fulham	182,493	54.1%	1.1%	1.1%	0.6%	10.0%	0.2%	0.5%	23.8%	8.4%
Park Royal Total	4,941	48.7%	1.4%	3.9%	0.3%	21.7%	1.2%	0.8%	14.6%	7.3%

Source: Census 2011

A study on the gender pay gap by the Government Equalities Office showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to difference in years of experience of full-time work, 16% is due to negative effect on wages of having previously worked part –time or having taken time out of the labour market to loof after family. 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

Table B1-6 Percentage of population by gender

Area	Total	Male	Female
England & Wales	56,075,912	49.2%	50.8%
England	53,012,456	49.2%	50.8%
London	8,173,941	49.3%	50.7%
Inner London	3,231,901	49.8%	50.2%
Outer London	4,942,040	49.1%	50.9%
Ealing	338,449	50.0%	50.0%
Brent	311,215	50.3%	49.7%
Hammersmith and Fulham	182,493	48.7%	51.3%
Park Royal & Old Oak	4,941	51.2%	48.8%

Source: Census 2011

Table B1-7 Marital Status

Area	All Categories	Single	Married	Same Sex Civil Partnership	Separated	Divorced	Widowed
England & Wales	45,496,780	34.6%	46.6%	0.2%	2.6%	9.0%	7.0%
England	42,989,620	34.6%	46.6%	0.2%	2.7%	9.0%	6.9%
London	6,549,173	44.1%	39.8%	0.4%	3.2%	7.4%	5.0%
Inner London	2,636,853	53.5%	31.2%	0.7%	3.5%	7.3%	3.9%
Outer London	3,912,320	37.8%	45.7%	0.3%	3.0%	7.4%	5.8%
Ealing	269,572	40.6%	44.1%	0.4%	3.0%	6.8%	5.1%
Brent	248,458	42.1%	43.2%	0.3%	3.4%	6.2%	4.7%
Hammersmith and Fulham	152,863	55.9%	29.6%	0.5%	2.9%	7.4%	3.7%
Park Royal & Old Oak	3931.3	50.7%	34.2%	0.5%	4.1%	7.5%	3.0%

Source: Census 2011

B.1.3 Data Gaps and Uncertainties

- Future population makeup for OPDC area
- Proportion of the population that is transgender/has undergone gender reassignment
- Sexual Orientation of the population
- Data on pregnancy and maternity in relation to the local population and employment

B.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment:

- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Education, Skills and Training Deprivation (Indices of Deprivation for England 2010).

B.2.1 OPDC Area

The area's level of skills and educational deprivation is average though there is great disparity between the adjoining boroughs. The low population density also creates uncertainty in the identification of trends.
The percentage of people with no qualifications in 2011 was 16%. The percentage of people with NVQ Level 4 qualification or above was 36.5% compared with 44.7% for Inner London and 27.4% for England.

Table B2-1 Percentage of the population and level of qualification achieved

Area	All Student Age	No Qualifications	Level 1	Level 2	Apprenticeship	Level 3	Level 4Above	Other
England & Wales	45,496,780	23%	13.3%	15.3%	3.6%	12.3%	27.2%	5.7%
England	42,989,620	22%	13.3%	15.2%	3.6%	12.4%	27.4%	5.7%
London	6,549,173	18%	10.7%	11.8%	1.6%	10.5%	37.7%	10.0%
Inner London	2,636,853	16%	8.5%	9.4%	1.0%	10.1%	44.7%	10.5%
Outer London	3,912,320	19%	12.3%	13.5%	2.1%	10.7%	33.0%	9.7%
Ealing	269,572	16%	9.9%	10.5%	1.4%	9.6%	37.0%	15.1%
Brent	248,458	19%	10.4%	10.9%	1.2%	9.7%	33.3%	15.4%
Hammersmith and Fulham	152,863	13%	7.0%	8.3%	1.2%	10.7%	49.6%	10.5%
Park Royal Total	3,931	16%	9.0%	9.9%	1.9%	9.0%	36.5%	17.4%

Source: Census 2011

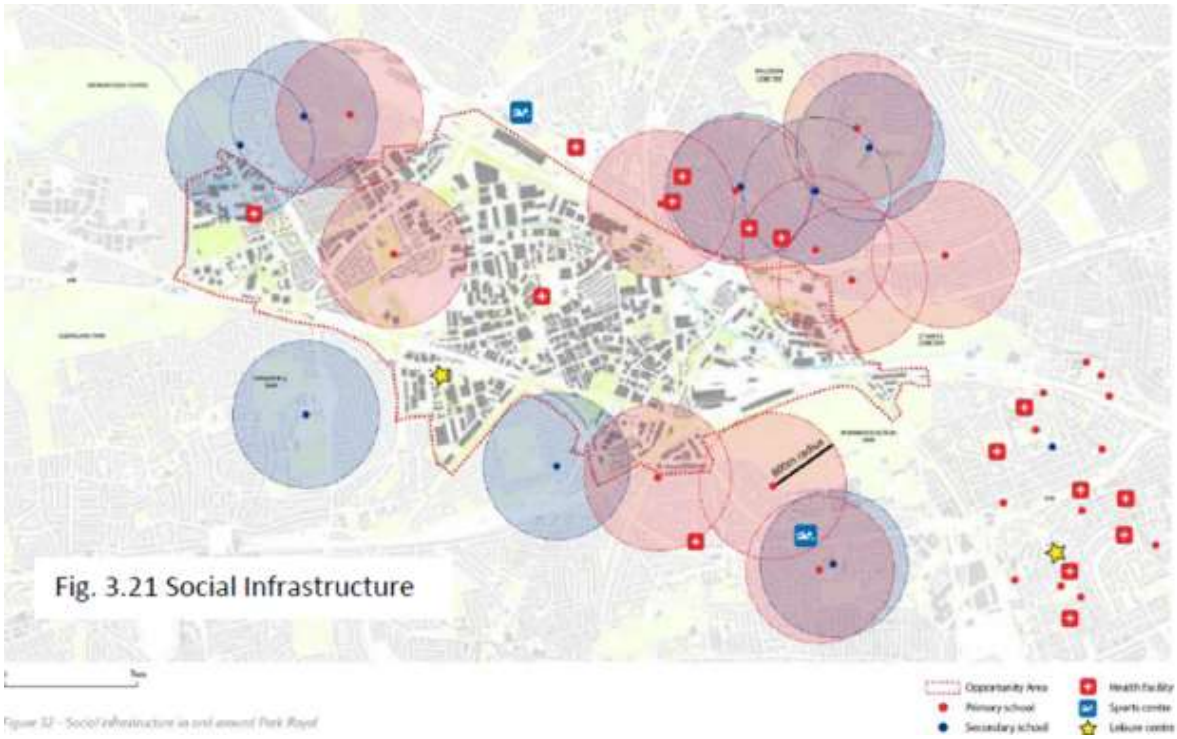
Figure B2-1 Education, Skills and Training Deprivation in OPDC



Source: Indices of Deprivation 2010 for England

Brent in particular has a higher percentage of at least one member of staff who isn't fully proficient at their job when compared to London and therefore the Local Plan should seek to include job skills training opportunities and further education facilities.

Figure B2-2 Education facilities adjoining OPDC Area



Source: OAPF Draft IIA Report, GLA, February 2015

As can be seen from **Figure B2-2** there is a gap in education facilities within the area. The Local Plan and future development needs to ensure adequate provision for the new residents and existing alike.

B.2.2 Data Gaps and Uncertainties

- Accessibility to secondary school education.
- Number and location of establishments offering life-long learning opportunities.

B.3 Health

The following baseline data has been used to identify key trends:

- Census 2011 health status data
- Census 2011 life expectancy
- Children living in poverty
- Childhood obesity rates
- Health Deprivation and Disability (Indices of Deprivation for England 2010)
- Provision of GPs and Healthcare

It is noted that a number of the other topics within this baseline will also have an influence on health levels, including data on: population, education, air quality, noise, crime, employment, deprivation and living environment, housing, biodiversity and open space (landscape and townscape).

B.3.1 OPDC Area

The health of people in the OPDC area is relatively good – 51.6% state they are in Very Good Health (see **Figure B3-1**). Deprivation is higher than average and 37.5% of children were living in poverty in 2010. Life expectancy for males in is 76.2% years, which was lower than the average for London. The average life expectancy for females was 83.6 years which is higher than the London average (82.8%). 8.6% of births between 2008 and 2012 were low birth weight births, which compares with a 7.4% nationally.

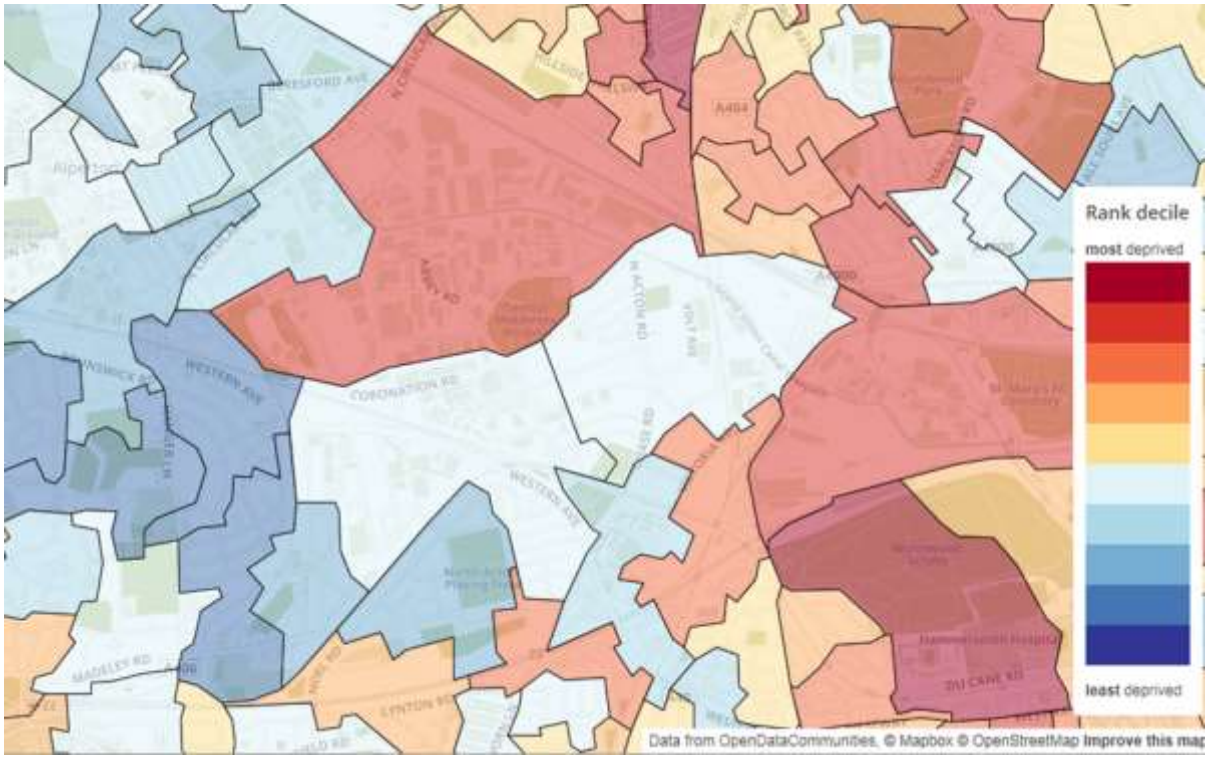
During the period 2010/11 and 2012/13, 11.8% of children at reception year were considered obese, with an additional 23.6% carrying excess weight. A further 23.6% of children in year 6 were identified as obese, with the same figure for London recorded at 22.5%.

Table B3-1 Census 2011 Health

Area	Total	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
England and Wales	56,075,912	47.1%	34.1%	13.2%	4.3%	1.3%
England	53,012,456	47.2%	34.2%	13.1%	4.2%	1.2%
London	8,173,941	50.5%	33.3%	11.2%	3.7%	1.2%
Inner London	3,231,901	52.6%	31.6%	10.5%	3.9%	1.4%
Outer London	4,942,040	49.1%	34.5%	11.7%	3.6%	1.1%
Ealing	338,449	49.2%	34.5%	11.4%	3.8%	1.2%
Brent	311,215	48.1%	34.8%	11.8%	4.0%	1.4%
Hammersmith and Fulham	182,493	56.5%	29.2%	9.4%	3.6%	1.3%
Park Royal & Old Oak	4,941	51.6%	33.9%	9.6%	3.9%	0.9%

The OPDC area includes at least one LSOA in the bottom 20% for health deprivation and disability; see **Figure B3-1** below.

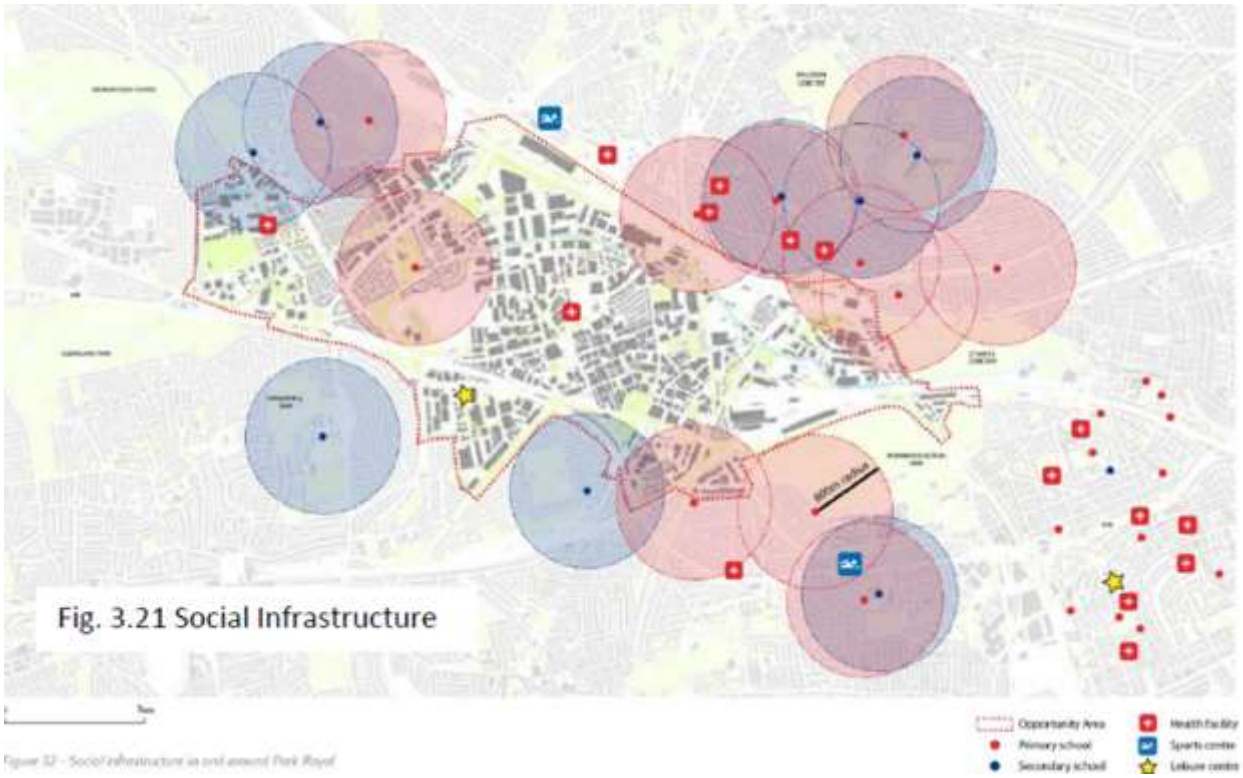
Figure B3-1 Health Deprivation and Disability in OPDC



Source: Indices of Deprivation 2010 for England

Due to its industrial nature and history, there is a lack of primary care facilities within the OPDC boundaries, with the exception of Central Middlesex Hospital, as seen from **Figure B3-2**.

Figure B3-2 Provision of GPs and Healthcare in OPDC



Source: OAPF Draft IIA Report, GLA, February 2015

B.3.5 Data Gaps and Uncertainties

- Proportion of population in area with access to hospital / GP / Dentist
- How children travel to school
- Play and open space quality, quantity and accessibility
- Further detailed information on disability and accessibility throughout the OPDC area and its buildings

B.4 Crime

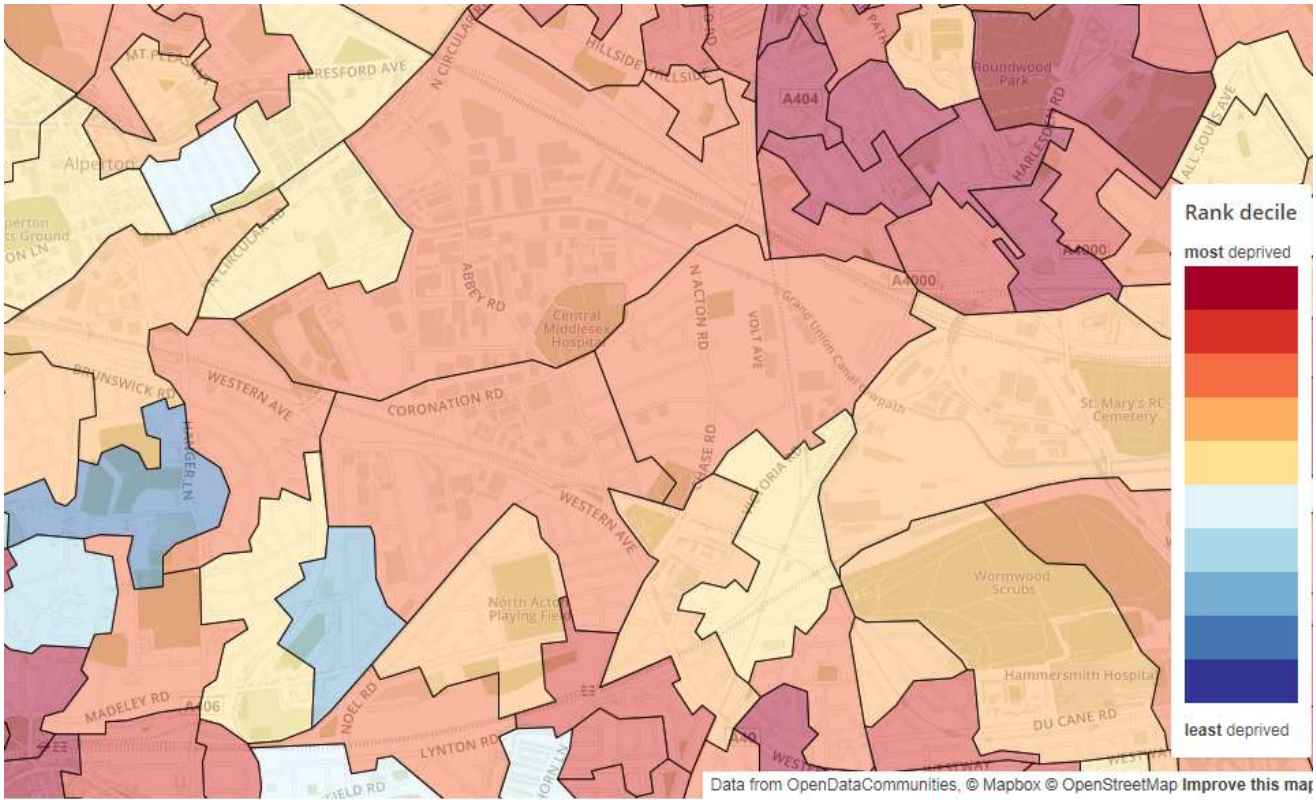
The following baseline data has been identified:

- Crime rates (Indices of Deprivation).
- Car theft
- Violence against persons (rank)
- Total Crime (rank)

B.4.1 OPDC Area

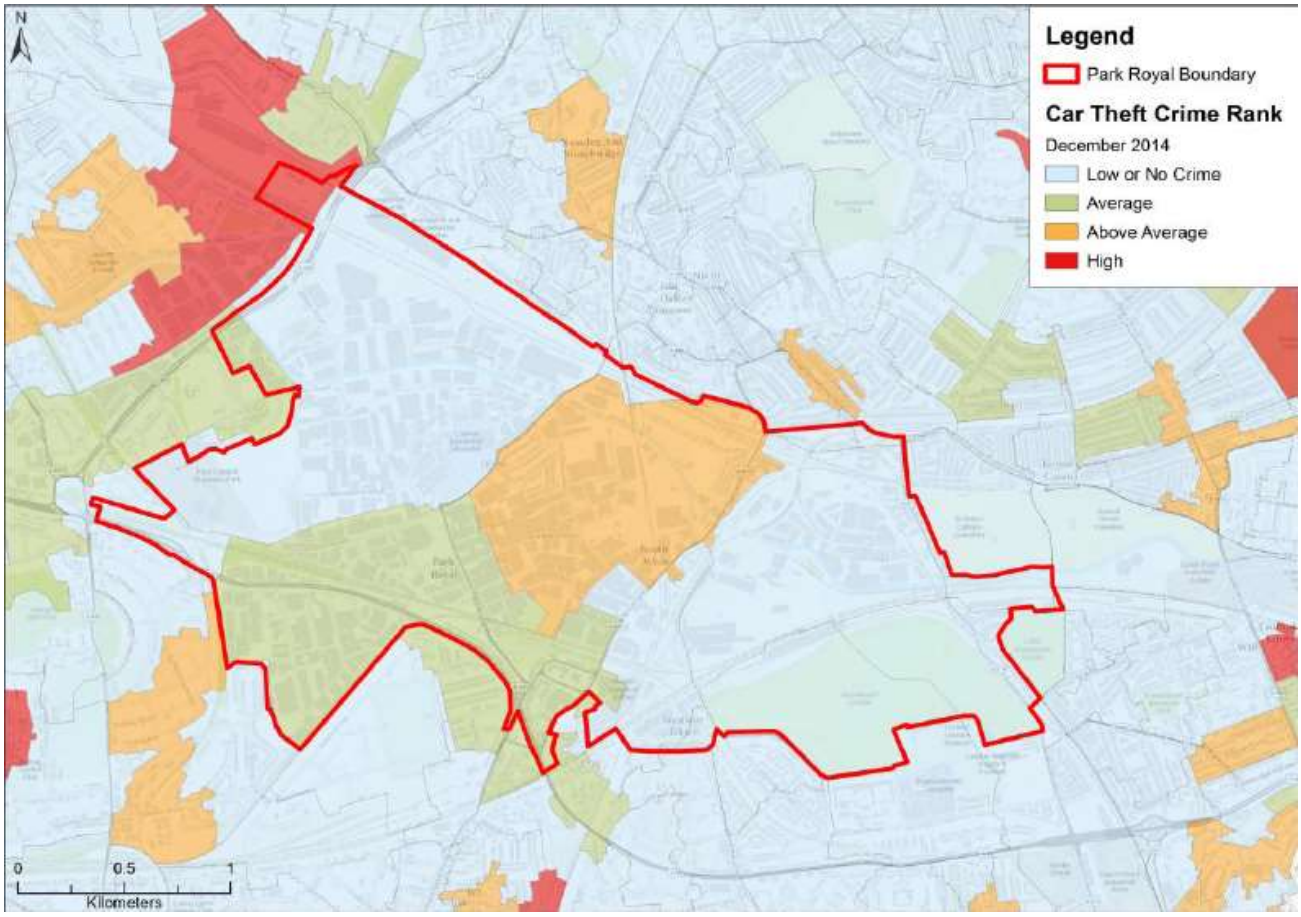
Crime in and around the OPDC area is predominantly violent crime or anti-social behaviour offences. The area is one of the more deprived areas of the country in terms of crime.

Figure B4-1 Crime Deprivation in OPDC



Source: Indices of Deprivation 2014

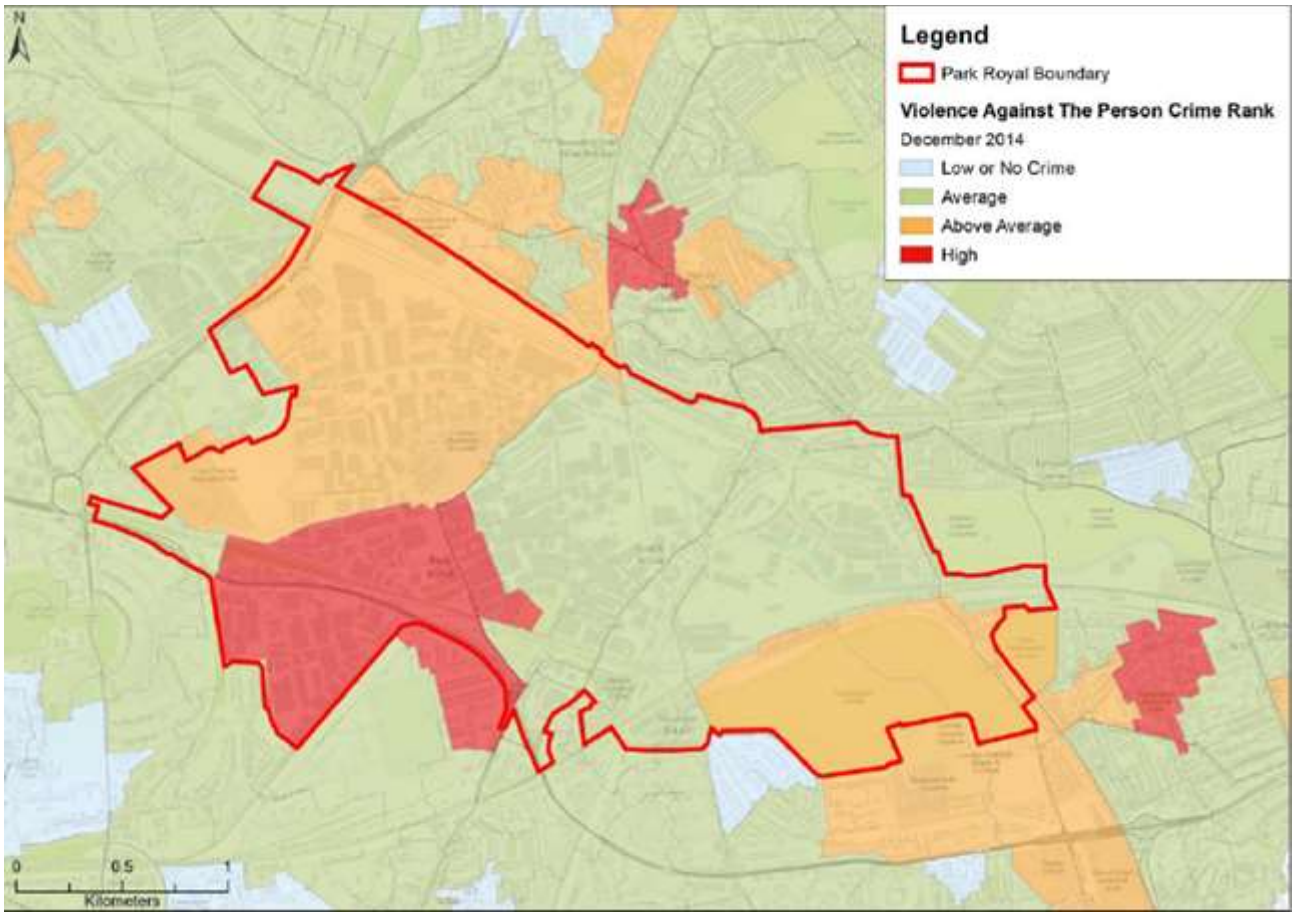
Figure B4-2 Car Theft



Source: OAPF Draft IIA Report, GLA, February 2015

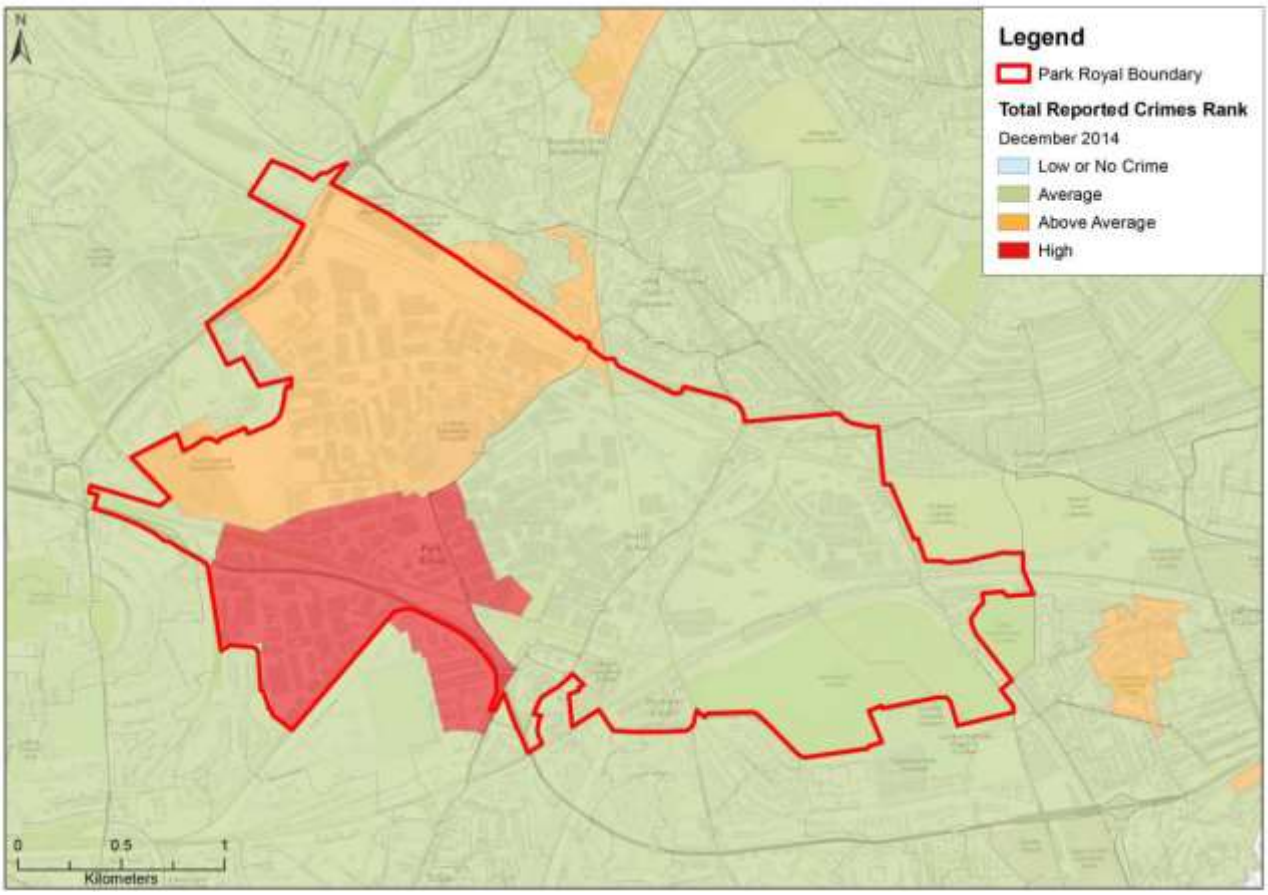
Car theft is average or above average in the centre of the OPDC (see **Figure C4-2**). Violence against persons is alo high or above average in the majority of the OPDC area. Given the industrial nature of the site, the Local Plan should seek to ensure that the design new development improves the safety and perceived safety of the community and their property.

Figure B4-3 Violence against Persons



Source: OAPF Draft IIA Report, GLA, February 2015

Figure B4-4 Total Crime Rank



Source: OAPF Draft IIA Report, GLA, February 2015

B.4.2 Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live
- Percentage of people who feel safe travelling on public transport at night
- How to best incorporate influx of population

B.5 Water

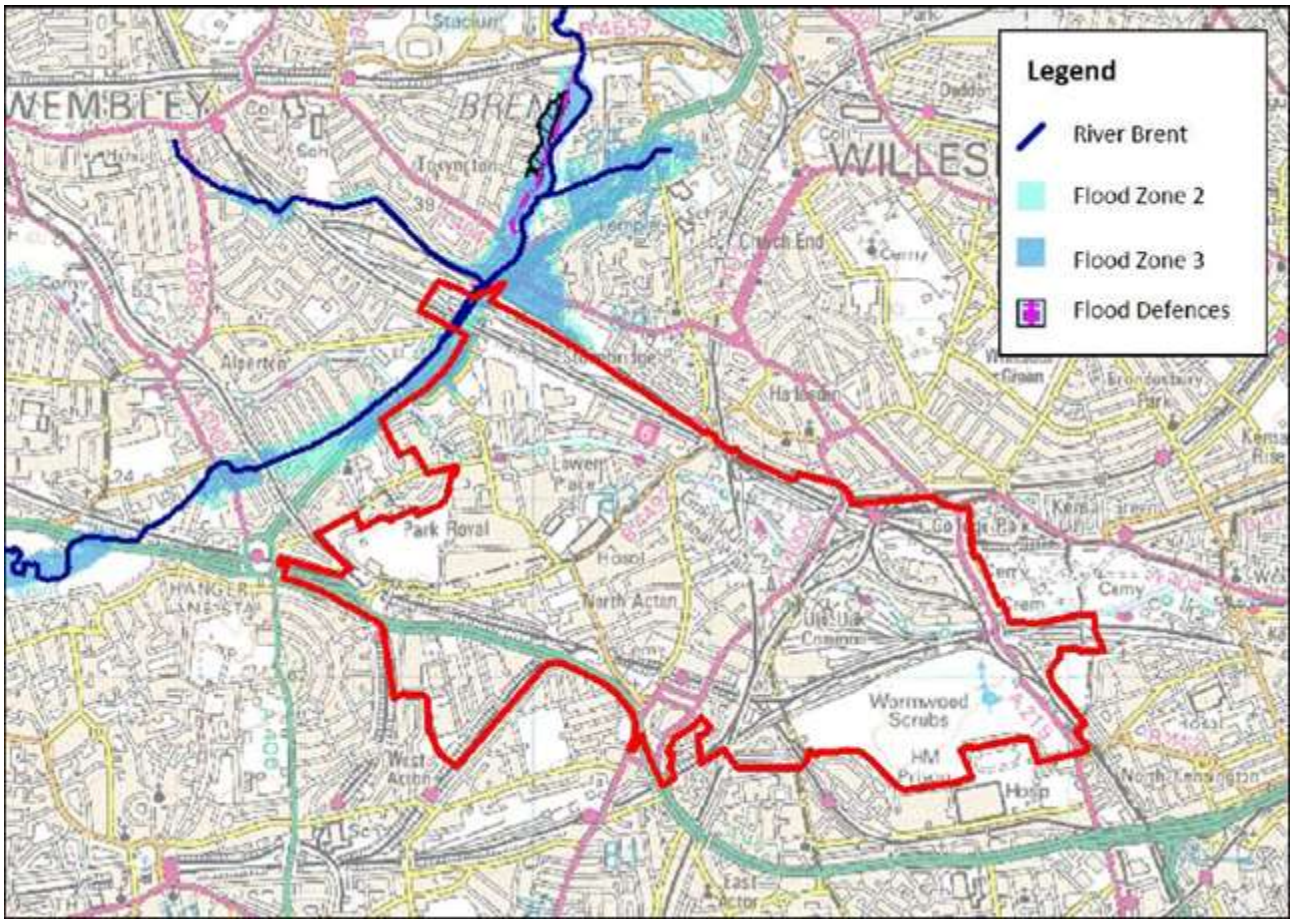
The following baseline indicators have been used to characterise the water environment within in the OPDC area:

- River catchment areas (Environment Agency Thames Catchment Flood Management Plan, 2009)
- Distribution of areas at risk of fluvial flooding (Environment Agency Fluvial Flood Map)
- Areas susceptible to surface water flooding (Environment Agency Surface Water Flood Map)
- Water and groundwater quality (Environment Agency).

B.5.1 OPDC Area

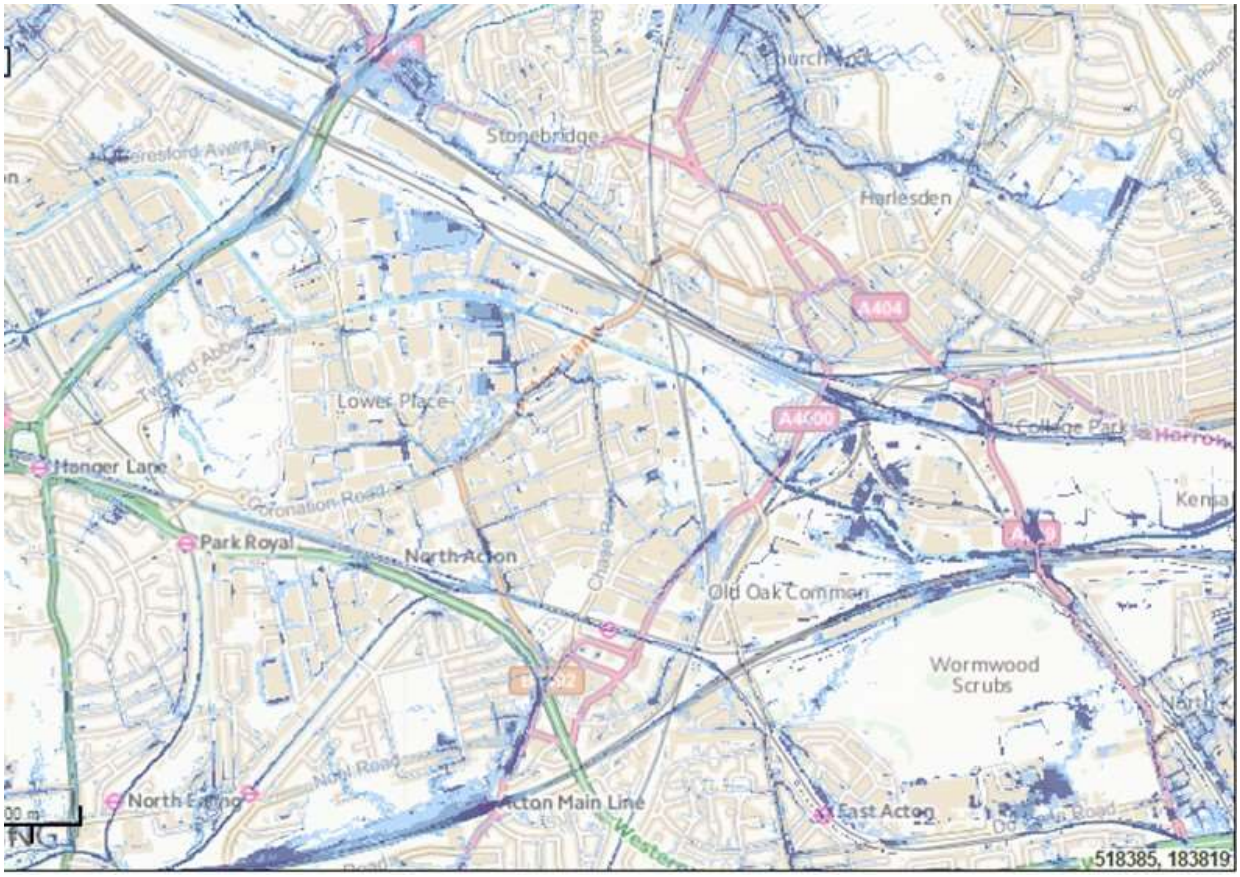
Water is an essential resource required for both domestic and industrial use. The study area's western boundary follows the lie of the River Brent and the Grand Union Canal runs from west to east of the area. The main source of flood risk to the area lies fluvial flood risk at its western edge and from surface water puddling along the road network of area (Figures C5-1 and C5-2). There is particular risk around Old Oak Common station and the area immediately to the north of Central Middlesex Hospital in Park Royal. Fluvial flooding is associated with the River Brent. There are small areas of Flood Zone 2 and 3 in the north-western corner of the area.

Figure B5-1 Fluvial Flood Risk



Source: Environment Agency Flood Map

Figure B5-2 Surface Water Flood Risk in OPDC



Source: Environment Agency Flood Map

Each Londoner on average consumed 161 litres of water per day compared to the England and Wales average of 149 litres per day. In the past 20 years, Thames Water has seen a 15% increase in water usage throughout London. This is equivalent to an increase of 10 litres per person per decade.
Both River Brent and Grand Union Canal are currently characterised as having poor water quality for their chemical and biological makeup. The Thames RBMP Actions for the Lower Brent indicate a desire to provide fish easement for three weirs between Brent Junction and Queensbury Road. Development with within the OPDC area could contribute to an improvement in the watercourses' water quality overall.

B.5.2 Data Gaps and Uncertainties

- Further objectives could be identified from adjoining Borough's Surface Water Management Plan
- Thames Water have indicated that Counters Creek is at capacity for any new influx into the combined sewer system – but formal assessment has not been identified.

B.6 Soil and Land Quality

The following baseline indicators have been used to characterise the soil and land quality conditions across the borough and within the four London boroughs:

- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Number of active / historic landfills on the site (Environment Agency)

B.6.1 OPDC Area

The 2010 ONS Local Profile in **Table C6-1** highlights the amount of previously developed land available in the three boroughs that make up the Old Oak and Park Royal Development Corporation. This reflects the high density urban environment of the borough.

Table B6-1 Previously Developed Land

	Vacant land Hectares	Vacant buildings Hectares	Derelict land and buildings Hectares	Land currently in use with known redevelopment potential Hectares	Land that is unused or may be available for redevelopment Hectares
Ealing	0	0	0	0	140
Hammersmith and Fulham	0	10	0	0	100
Brent	0	20	30	10	150
London	640	330	270	340	3,660

Source: ONS Local Profiles

According to the Environment Agency website there is one historic landfill within the area boundary (Twyford Service Station). The last waste received at this site was in 1968. However there are other sites, particularly within Old Oak which will need to be relocated and the waste apportionment dealt with due the proposed change in land use of the area.

B.6.2 Data Gaps and Uncertainties

- Area of contaminated land returned to beneficial use
- Type of contaminants within the OPDC area
- Extent of current and historic waste sites and waste transfer sites

B.7 Air Quality

The following baseline indicators have been used to identify environmental conditions and key trends:

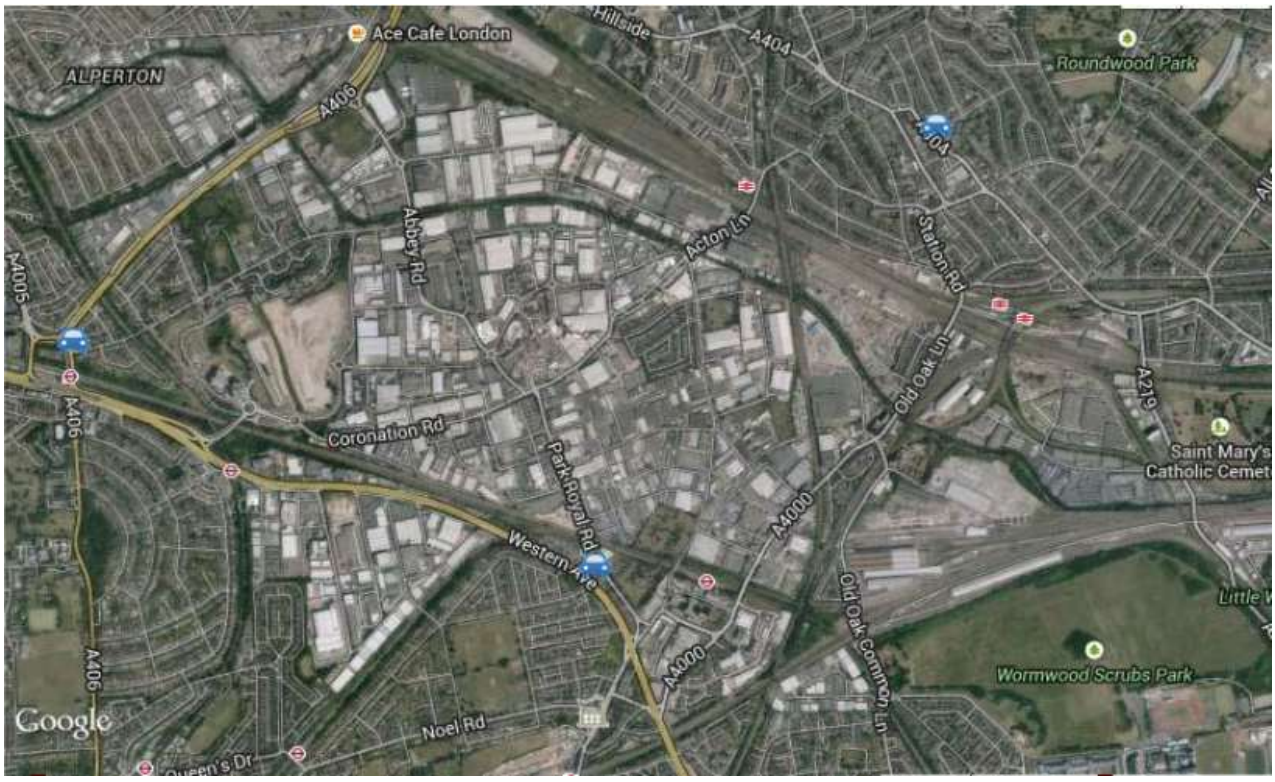
- Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive[2])
- Monitoring data for NO_2 and PM_{10}

B.7.1 OPDC Area

The principal threat to clean air in London comes from road traffic. Poor air quality can damage people's health and quality of life. It can pose particular problems for vulnerable groups such as the elderly, young children and people suffering from respiratory diseases.

AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. The whole of the OPDC area is considered to be within an AQMA for levels of NO_2 and PM_{10}. Each of the three boroughs have identified the same exceedances and types of pollutants. There are three monitoring sites though only two are within the OPDC boundary itself as shown in **Figure C7-1**. Hanger Lane Gyratory (Ealing) Air Quality monitoring Station in operation since 2003 and Western Avenue Air Quality Monitoring Station in operation since 2010 are roadside stations located at the southern boundary of the OA and are operated to LAQN standards. The highest recorded annual mean (see **Figure C7-3**) (1st January 2014 – 1st January 2015) of Nitrogen Dioxide (NO_2) concentration was measured at Hanger Lane Gyratory (67.6$\mu g/m3$) followed by Western Avenue at 64.367.6$\mu g/m3$ both exceeding the objective mean of 40$\mu g/m3$. There are areas of high NO_2 concentrations in the OPDC area, particularly along the strategic highway network.

Figure B7-1 AQMA in the OPDC



Source: Defra

[2] http://uk-air.defra.gov.uk/aqma/maps

Figure B7-2 AQMA Objectives

National air quality objectives and European Directive limit and target values for the protection of human health

Pollutant	Applies	Objective	Concentration measured as[10]	Date to be achieved by and maintained thereafter	European obligations	Date to be achieved by and maintained thereafter	New or existing
Particles (PM_{10})	UK	50µg.m^{-3} not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m^{-3} not to be exceeded more than 35 times a year	1 January 2005	Retain existing
	UK	40µg.m^{-3}	annual mean	31 December 2004	40µg.m^{-3}	1 January 2005	
	Indicative 2010 objectives for PM_{10} (from the 2000 Strategy and 2003 Addendum) have been replaced by an exposure reduction approach for $PM_{2.5}$ (except in Scotland – see below)						
	Scotland	50µg.m^{-3} not to be exceeded more than 7 times a year	24 hour mean	31 December 2010			Retain existing
	Scotland	18µg.m^{-3}	annual mean	31 December 2010			
Particles ($PM_{2.5}$) Exposure Reduction	UK (except Scotland)	25µg.m^{-3}	annual mean	2020	Target value 25µg.m^{-3} [12]	2010	New (European obligations still under negotiation)
	Scotland	12µg.m^{-3}		2020	Limit value 25µg.m^{-3}	2015	
	UK urban areas	Target of 15% reduction in concentrations at urban background[11]		Between 2010 and 2020	Target of 20% reduction in concentrations at urban background	Between 2010 and 2020	
Nitrogen dioxide	UK	200µg.m^{-3} not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m^{-3} not to be exceeded more than 18 times a year	1 January 2010	Retain existing
	UK	40µg.m^{-3}	annual mean	31 December 2005	40µg.m^{-3}	1 January 2010	
Ozone	UK	100µg.m^{-3} not to be exceeded more than 10 times a year	8 hour mean	31 December 2005	Target of 120µg.m^{-3} not to be exceeded more than 25 times a year averaged over 3 years	31 December 2010	Retain existing

Source: Defra

Figure B7-3 Air Quality Monitoring data 1st January 2014-1st January 2015

	Nitrogen Dioxide NO2	Particles PM10
Ealing - Western Avenue	64.3	29.3
Ealing - Hanger Lane Gyratory	67.6	25.4
Brent - John Keble Primary School	N/A	21.9

Source: OAPF Draft IIA Report, GLA, February 2015

B.7.2 Data Gaps and Uncertainties

- Extent to which new development should adhere to the Mayor's Air Quality Neutral benchmark.
- How existing business can reduce reliance on road freight traffic with introduction of rail improvements

B.8 Energy and Climate Change

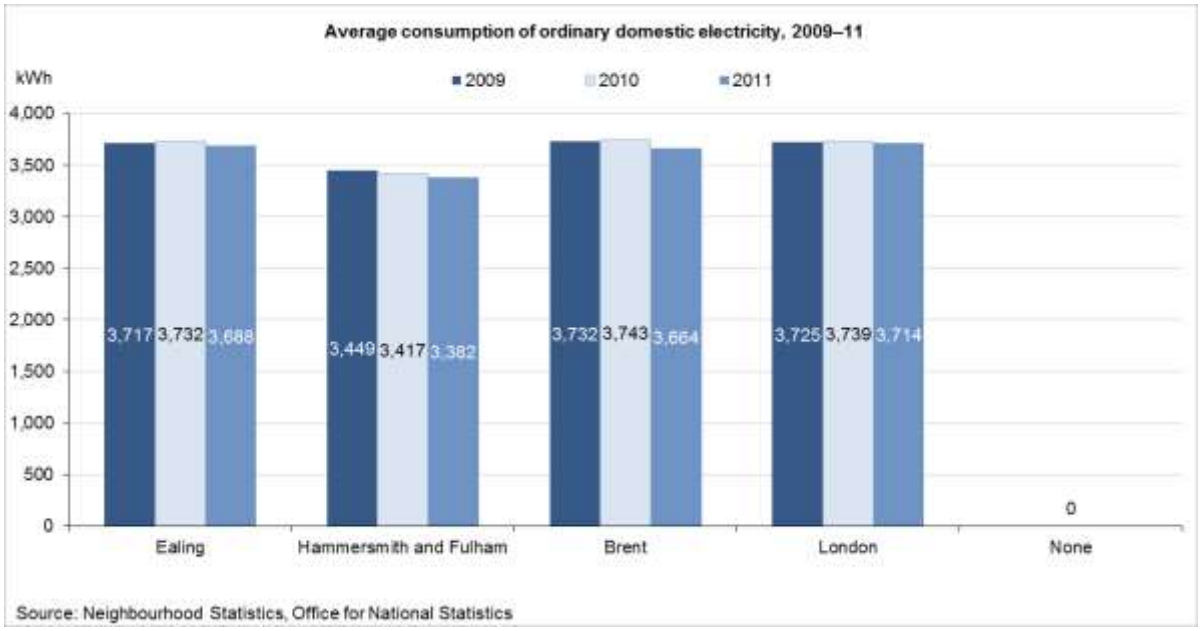
The following baseline indicators have been used:

- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).

B.8.1 OPDC Area

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The area will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

Table B8-1 Average consumption of ordinary domestic electricity



Source: ONS Local Profiles

The three boroughs perform similarly when compared to London and each other for average consumption domestic electricity. The scale of development should seek to encourage as energy efficient development as possible, as well as consider the positive benefit of a site-wide decentralised energy network.

Table B8-2 Energy Consumption by Sector

Energy consumption by sector

2011

	Total	Industry and commercial	Domestic	Transport
	gWh	gWh	gWh	gWh
Ealing	5,127	1,746	2,249	1,132
Hammersmith and Fulham	3,198	1,386	1,227	586
Brent	4,037	1,199	2,044	794
London	134,347	50,341	55,547	28,178

Source: ONS Local Profiles

The Planning and Energy Act 2008 allows local authorities to include policies in their local plan's setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the Local Plan with the need to ensure that the environment of the borough is not adversely affected.

B.8.2 Data Gaps and Uncertainties

- Area specific energy data
- Greenhouse gas emissions data
- Levels of energy efficiency in homes and commercial buildings
- Energy consumption in industrial units within Park Royal and Old Oak

B.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the four boroughs and within the LLDC area boundary:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) (MAGIC, www.magic.gov.uk and Local Authority websites).
- Key Biodiversity Action Plan (BAP) species and habitats present (London BAP).

B.9.1 OPDC Area

London is a surprisingly green city and approximately 48% is surfaced in vegetation, rivers and still waters. London supports thousands of species, from algae and fungi to molluscs and mammals

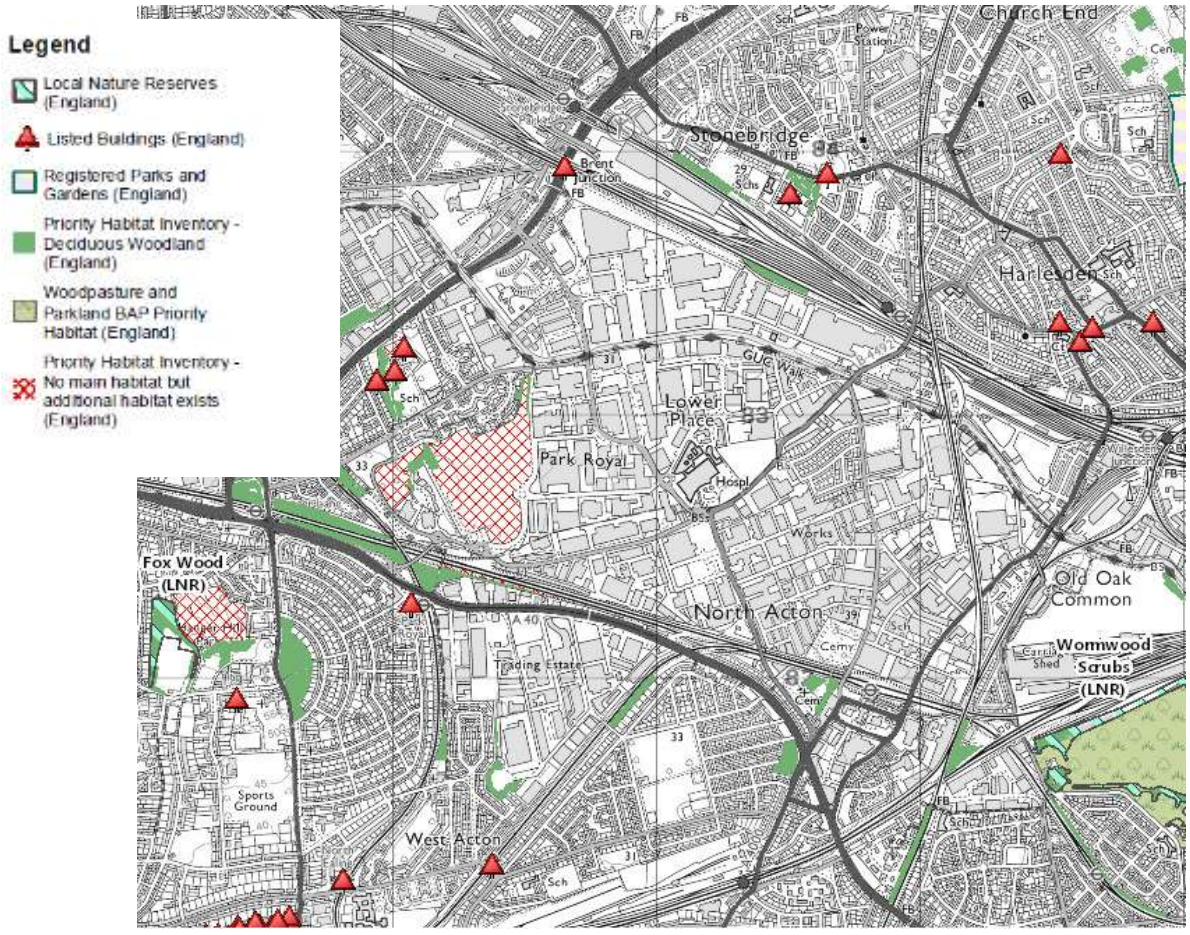
Within the OPDC area there are no SACs, SPAs, Ramsar sites, SSSIs or NNRs. There is one LNR: Wormwood Scrubs. The Grand Union Canal and adjacent area in Old Oak South is a nature conservation area of Metropolitan Importance. Other designated sites in proximity to the plan area are listed in **Table B9-1**.

Table B9-1 Closest statutory sites of international, national and local nature importance

Site Name	Designation	Approximate direction and distance from the OPDC area
Wormwood Scrubs	LNR	Within OPDC boundary
Fox Wood	LNR	675 metres, southwest
Westbere Copse	LNR	3.4km, northeast
Barn Elms Wetland Centre	SSSI	4.4km, south
Richmond Park	SAC	6.9km, south
Wimbledon Common	SAC	8km, south

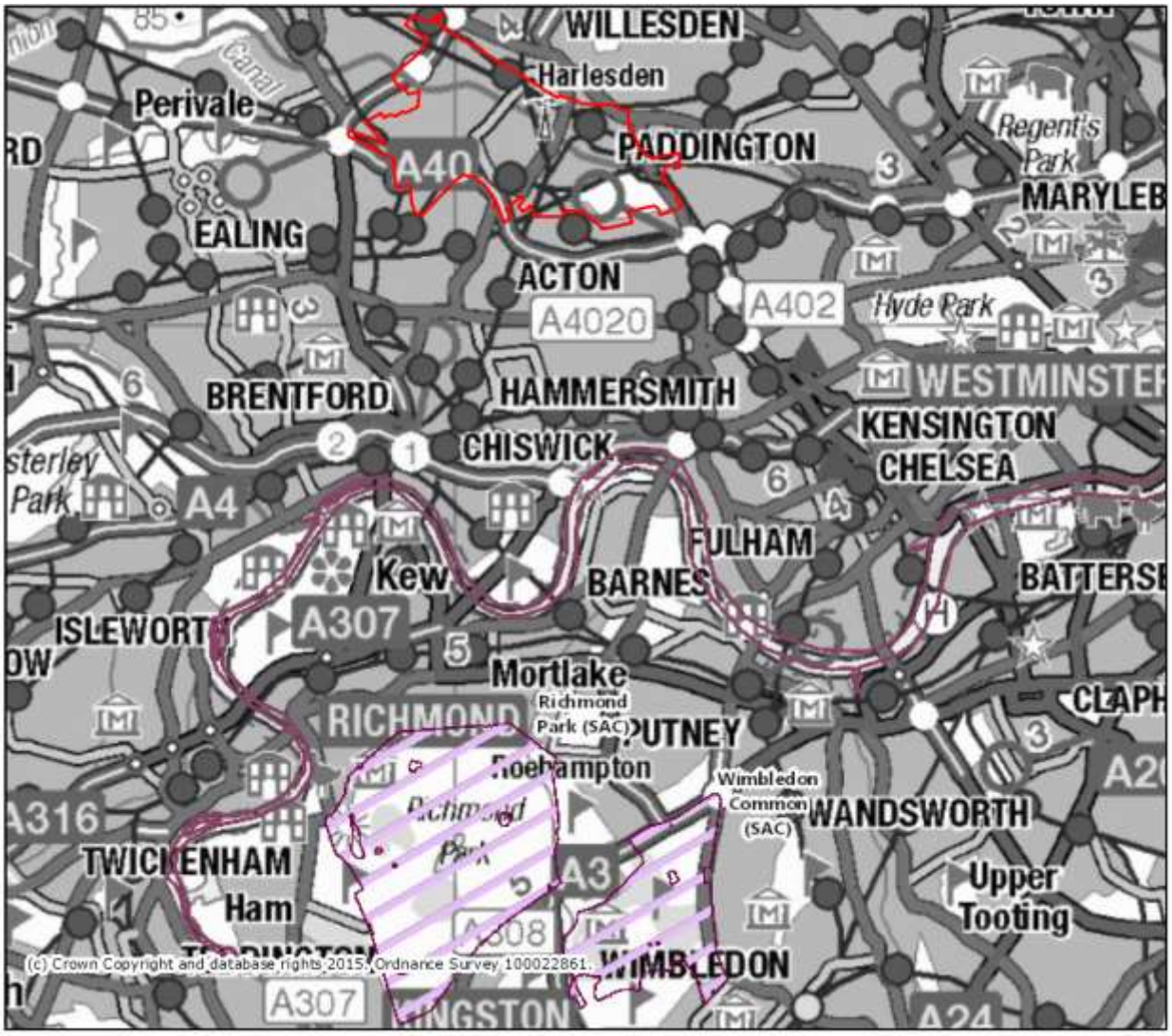
Wormwood Scrubs Local Nature Reserve's habitat and species should be protected and enhanced.

Figure B9-1 Designated Sites



Source: Magic.gov.uk, 4 August 2015

Figure B9-2 International Designations



Source: Magic.gov.uk, 4 August 2015

The area presents an opportunity to create and protect other sites within the boundary as well as promote green habitat connectivity to areas outside the boundary.

The UK government published 'Biodiversity: The UK Action Plan' in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In additional there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System[3]).

The London BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. London BAP species and habitats include the following:

Habitat Action Plans

- Acid grassland

[3] http://www.ukbap-reporting.org.uk/

- Chalk grassland
- Heathland
- Parks and urban greenspaces
- Private gardens
- Reedbeds
- Rivers and streams
- Standing water
- Tidal Thames
- Wasteland
- Woodland

Species Action Plans

- Bats
- Black poplar
- House sparrow
- Mistletoe
- Reptiles
- Sand martin
- Stag beetle
- Water vole

Source: London BAP[4]

B.9.2 Data Gaps and Uncertainties

- No records of other priority habitats and species within the boundary area
- Data relating to biodiversity on brownfield land/railway sidings in particular
- Data relating to the connectivity of greenspaces and the mapping of any greenspaces (non-designated) across the area

B.10 Cultural Heritage

The following baseline indicators have been used to characterise the heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens[5].
- Historic England Heritage Assessment of Old Oak[6]

[4] http://www.lbp.org.uk/londonpriority.html

[5] www.magic.gov.uk

[6] http://research.historicengland.org.uk/redirect.aspx?id=6294

B.10.1 OPDC Area

There is one listed asset within the OPDC area – Brent Viaduct.

There are no SAMs within the area.

Within the boundary there are 2 Conservation Areas, these include:

- Old Oak Lane; and
- along Grand Union Canal.

Adjacent to the study area are the St. Mary's Conservation Area in Hammersmith and Fulham, which includes the St Mary's Cemetery and parts of the Kensal Green Cemetery. The Kensal Green Cemetery Conservation Area in The Royal Borough of Kensington and Chelsea incudes the majority of the listed buildings and monuments and the majority of the Registered Park and Garden (Grade I registered Park and Garden of special historic interest which contains the Grade I listed Anglican Chapel, twelve Grade II* listed buildings or monuments and 147 Grade II listed buildings or monuments).

Within the surrounding area, the following conservation areas may also be affected by development within the OPDC area:

- Harlseden;
- Old Oak and Wormholt;
- Hangerhill Garden Estate; and
- Hagerhill (Hay Mills) Estate.

Prior to the mid-nineteenth century, Old Oak Common area was common-ground and farmland sitting beside the Grand Junction Canal (now the Grand Union Canal) from its development in 1794. With the arrival of the railways in 1838 and their expansion into the twentieth century, industry shortly followed along the railways and the canal making use of these connections. By the late nineteenth century, Old Oak Common had been transformed into an industrial area home to heavy industries and works supporting the railways.

Following the First World War, the increase in motorised transport saw the arrival of motor car production with Park Ward manufacturing Rolls Royce vehicles at its site on Hythe Road. In the latter half of the twentieth century, redevelopment of some of the Victorian industrial buildings for lighter industry and office floorspace was carried out reflecting the restructuring of the national economy.

To the west in Park Royal, the area generally known as Twyford was farmland until the Royal Agricultural Show took place from 1903 to 1905 (which provides the area's name). Following 1905, the industrial character began to emerge with the area used as a munitions factory during the First World War alongside manufacturing and food production. By 1932 there were 73 factories employing 13,500 workers which grew to over 45,000 in the 1960s following relatively light bomb damage in the Second World War and the post-war boom period. Through the latter part of the twentieth century, industrial restructuring saw the relocation of large multinational firms, such as Heinz, away from Park Royal.

Other notable listed buildings whose setting could be affected by development in the Opportunity Area include the Grade II* listed gatehouse and chapel at Wormwood Scrubs Prison, the Church of All Souls Harlesden (also Grade II*), and thirteen Grade II listed buildings within 250m of the boundary. Further afield are Statutory Listed buildings, the closest being Kenmont Primary School and Park Royal Underground Station.

The Old Oak Common and Park Royal areas have a disparate assortment of railway and industrial heritage that play a valuable role in informing the evolving character of the area. Specific collections of non-designated heritage assets are located along the east of Scrubs Lane, the interwar Rolls Royce works and Acava Studios on Hythe Road. The OPDC would be seeking to designate and manage new Conservation Areas and a Local List.

A significant number of the heritage assets listed above are on English Heritage's Heritage at Risk Register. These include Kensal Green Cemetery, as well as 35 monuments within it, including the Anglican Chapel. Twyford Abbey to the west of the opportunity area is also a long standing Heritage at Risk case.

Whilst there are at present no archaeological priority areas within the proposed local plan area, the Greater London Historic Environment Record holds information on several archaeological investigations, sites and finds. Notably the site of Acton Wells 18th century spa is located within the Opportunity Area. The open ground of Wormwood Scrubs was the site of a rifle range and anti-aircraft battery and may preserve as yet undiscovered earlier remains. The Grand Junction Canal and Old Oak Common area include aspects of railway and industrial archaeological interest. The 19th century Park Royal cemetery would also be of interest if subject to redevelopment.

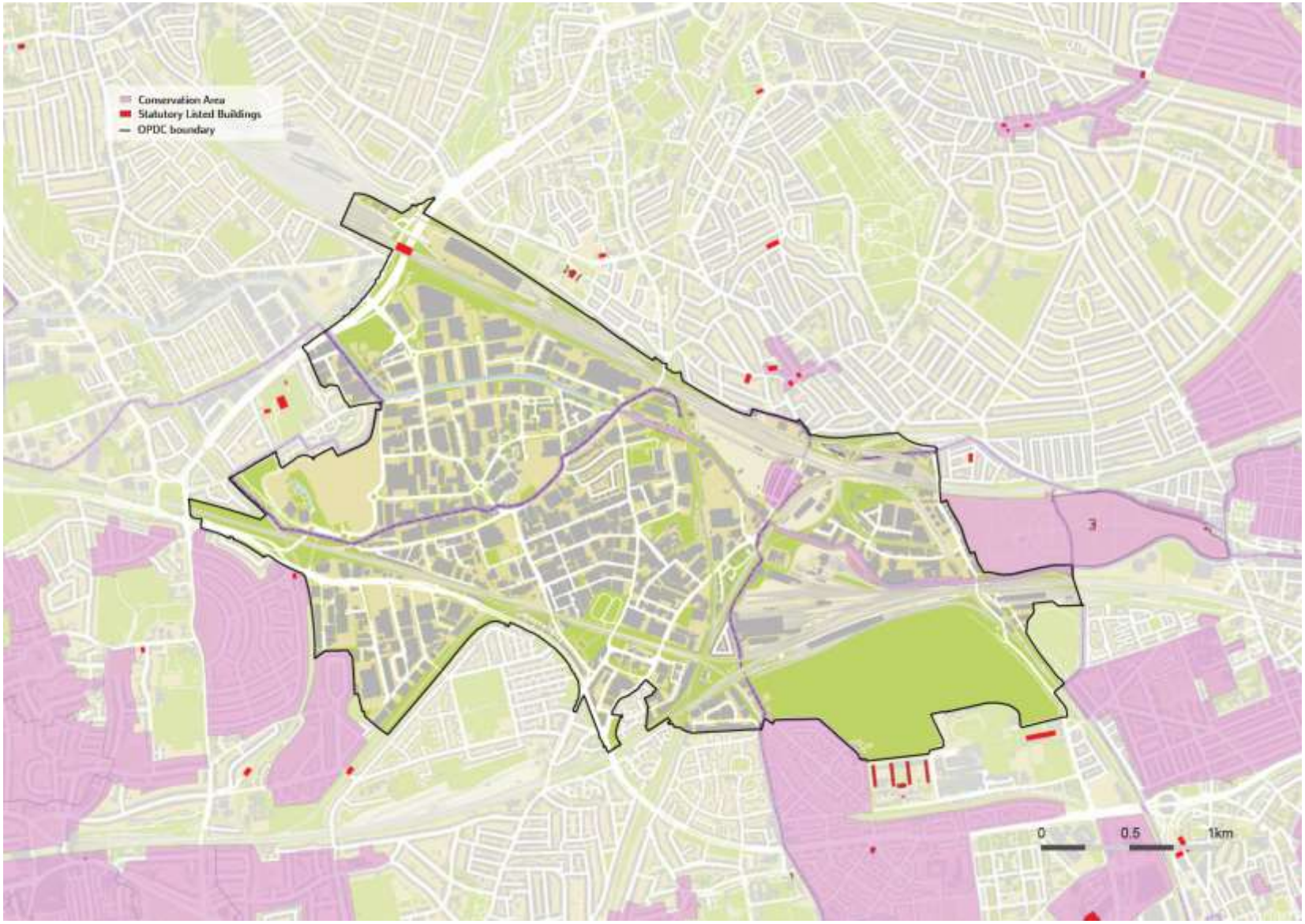
B.10.2 Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.)
- Boroughs' Local Lists of Heritage Assets

The following baseline indicators have been used to characterise the landscape and townscape baseline:

- Designated sites
- Land uses on the study area
- Conservation Areas
- Open Space

Figure B10-1Sites of Cultural and Archaeological Importance



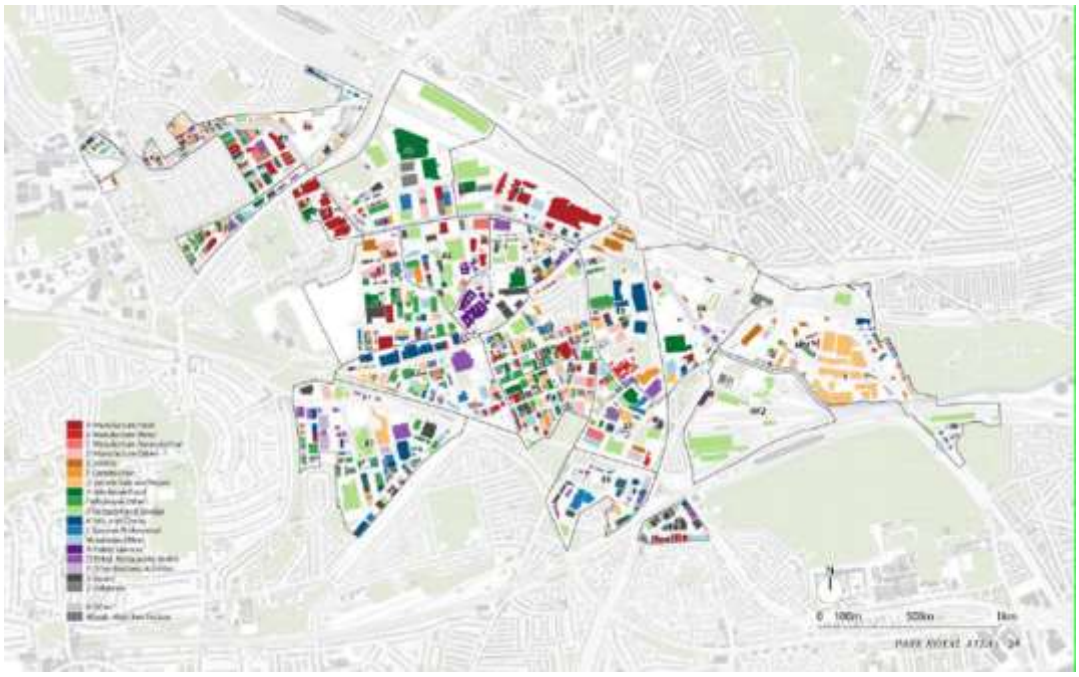
Source: Old Oak & Park Royal Opportunity Area Planning Framework (2015)

B.11.1 OPDC Area

There are no Areas of Outstanding Natural Beauty (AONBs) within OPDC.

The OPDC area comprises a largely industrial townscape with its edges influenced by more residential spaces. Railway infrastructure is a dominant feature across the site.

Figure B11-1 Land Uses in the Study Area



Source: OAPF Draft IIA Report, GLA, February 2015

The study area lies between two catchment areas – River Brent and the lost river of Counters Creek (now a combined sewer). Park Royal is predominantly warehousing and industrial units with Central Middlesex Hospital in the centre of it.

Old Oak is industrial units with the Cargiant site a dominant feature. At present a Crossrail depot is also being built there.

There is a Conservation Area along Old Oak Lane and along Grand Union Canal. The old Rolls Royce factory forms part of Old Oak.

Along the south-eastern boundary lies Wormwood Scrubs Park which is grassland and some woodland. The eastern boundary is Kensal Green Cemetery. While there are substantial areas of green space on the periphery of the plan area, the industrial nature of the area means that most parts have a severe open space deficiency. Integration with the All London Green Grid Area Frameworks is an important consideration.

B.11.2 Data Gaps and Uncertainties

- Number of noise and light pollution complaints
- Percentage of new housing completions in area achieving design standards such as Building for Life and Lifetime Homes

B.12 Waste

The following baseline indicators have been used to characterise the existing conditions:

- Percentage of household waste sent for reuse, recycling or composting (ONS Local Profiles).

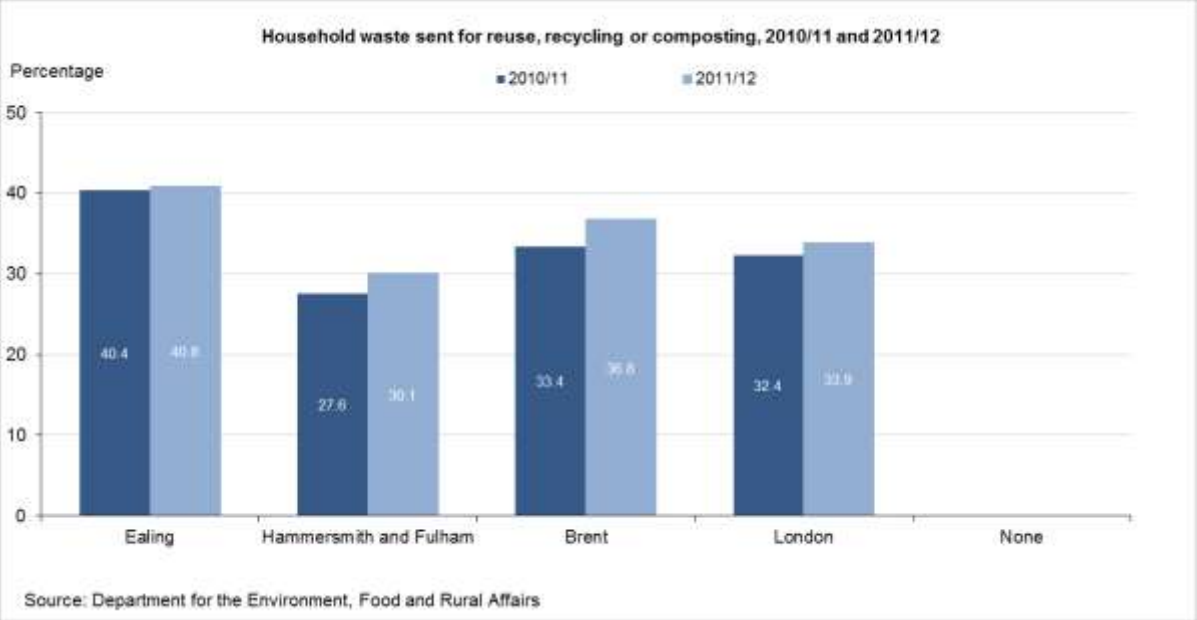
- Amount of residual waste per household (ONS).
- Amount of commercial and industrial waste produced (Defra).

B.12.1 OPDC Area

There are no area-specific statistics for the study area.

Recycling rates are higher for Ealing compared to Brent, Hammersmith & Fulham and London as a whole though they have increased between 2010 and 2012 (**Table B12-1**).

Table B12-1 Household Waste Sent for Reuse, Recycling or Composting



There is currently no data available on the municipal waste sent to landfill in the area.

There are several waste sites within the area:

- European Metal Recycling
- Powerday
- Capital Waste Ltd
- UK Tyre Exporters
- O'Donovan's Waste Disposal Ltd.

B.12.2 Data Gaps and Uncertainties

- Percentage of municipal waste sent to landfill in study area.
- Waste facilities available in each borough and how to deal with apportionment

B.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the borough:

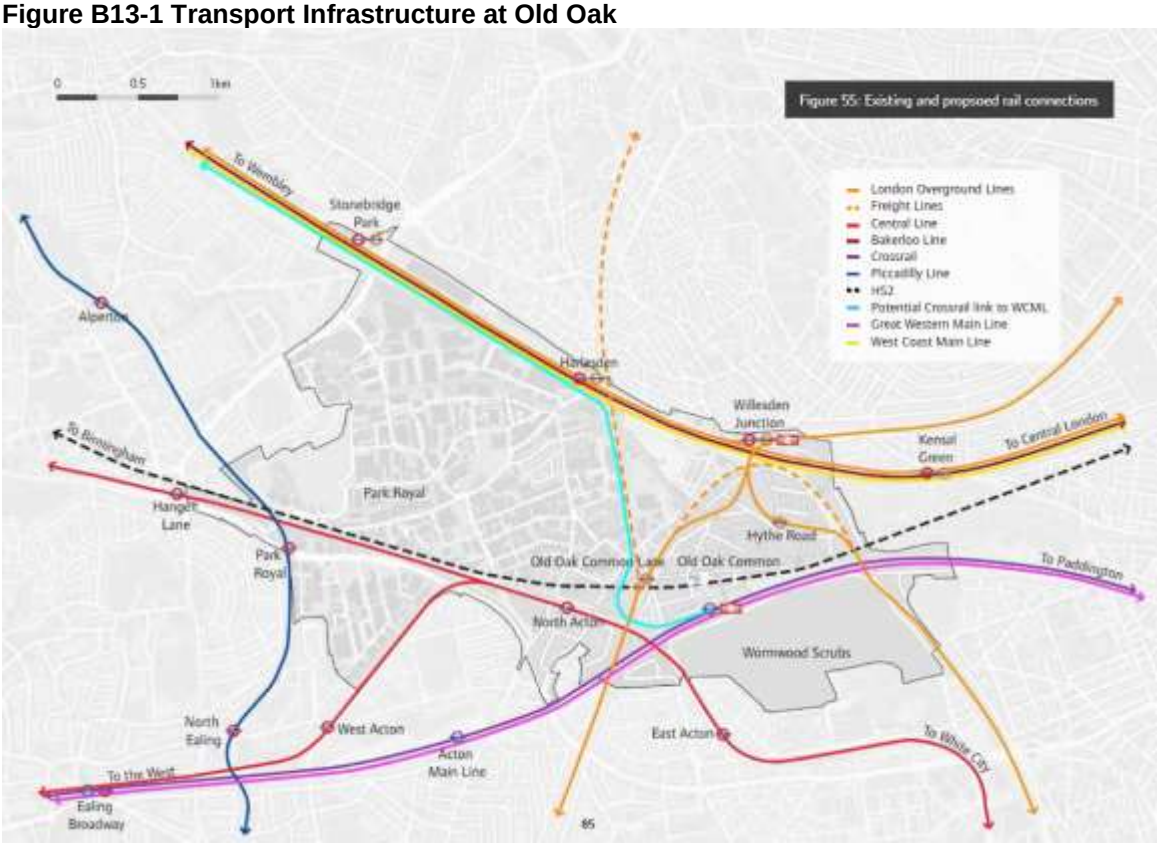
- Distribution of major transport systems – roads, rail links
- Draft Old Oak and Park Royal Opportunity Area Planning Framework, Transport Strategy, February 2015

B.13.1 OPDC Area

The Transport Strategy made a number of high level assumptions and modelled the impacts of area's proposals. It didn't take into account the transport impacts resulting from the relocation of existing activities. Further work is being explored to consider these elements. There is also a number of transport proposals identified which are contingent on land coming available which is likely to be beyond the 2031 timescales.

The new Old Oak Common station and surrounding interchange will be the key driver for development in the area and will be the focus of future transport connections. HS2 will provide 18 trains per hour between Old Oak and the North, with Birmingham Airport just 31 minutes from Old Oak. The new Crossrail station at Old Oak will provide up to 24 trains per hour into central London, as well as services towards Heathrow and Reading. The presence of a Crossrail station will be one of the most important transport connections to the site, providing a significant increase in rail capacity to the West End, City and Canary Wharf. Crossrail will provide excellent regional and sub-regional connectivity to Old Oak.

Figure B13-1 Transport Infrastructure at Old Oak

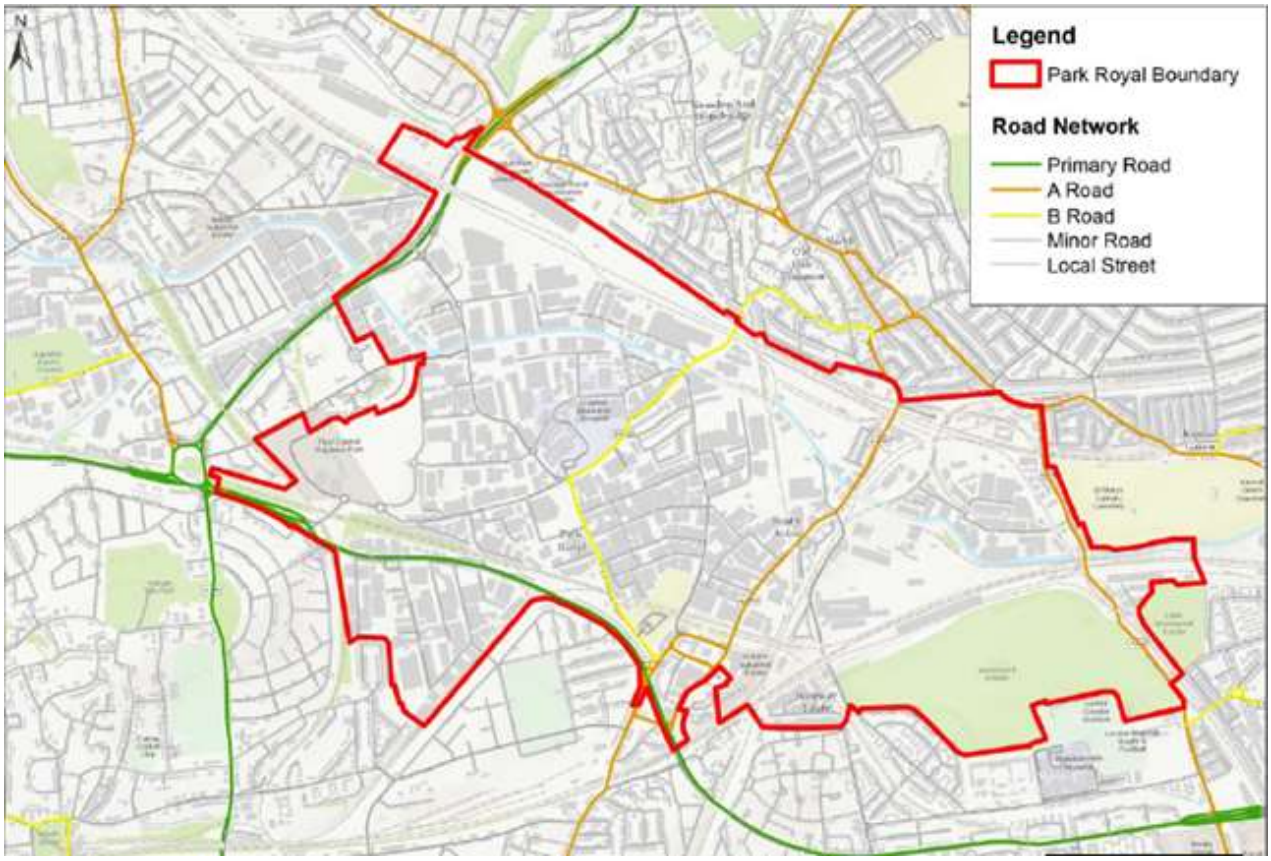


Source: OAPF Transport Strategy, GLA, February 2015

The study didn't consider the impacts of the number of homes being proposed nor the number of jobs. As such this needs careful consideration in the Local Plan.

Old Oak and Park Royal generate a significant number of road freight movements. The current road network is shown in **Figure B13-2**. Park Royal is home to London's largest industrial area and has significant wholesale, transport and warehouse activity. Any new proposals must consider the existing road users and capacity requirements, along with ensuring improvements in non-road transport, such as rail and by foot or cycle.

Figure B13-2 Road Network



Source: OAPF Draft IIA Report, GLA, February 2015

The Grand Union Canal presents a great opportunity for both water travel and freight movements as well as footpaths and should be considered a strategic transport link within the area.

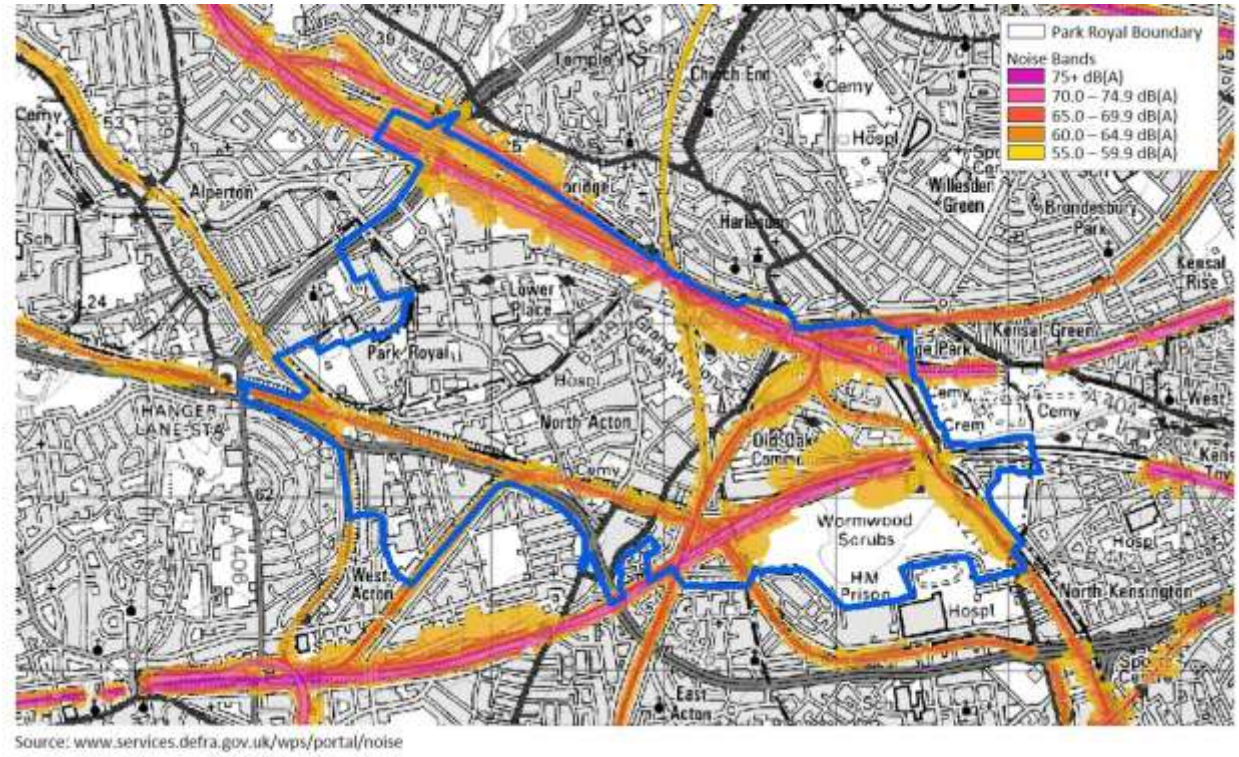
Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship. Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre and main distributor roads. Department for Environment, Food and Rural Affairs (Defra) Online road, rail and industrial noise mapping shows the extent to which these noise sources may affect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

Figure B13-3 Road Traffic Noise – average daytime



Source: www.services.defra.gov.uk/wps/portal/noise in OAPF Draft IIA Report, GLA, February 2015

Figure B13-4 Rail Noise – average daytime



Source: www.services.defra.gov.uk/wps/portal/noise in OAPF Draft IIA Report, GLA, February 2015

B.13.2 Data Gaps and Uncertainties

- Impacts on proposed quantum of development on existing businesses and residents in terms of access by road and rail

B.14 Economy

The following baseline indicators have been used to characterise economic conditions across the borough:

- Economy Local Profiles (ONS)
- Employment by industry (ONS- NOMIS).

B.14.1 OPDC Area

Smaller businesses, independent traders and entrepreneurs tend to dominate the study area. The image of Park Royal and Old Oak developments range from larger freight and wholesale businesses through to microbusinesses that survive because the area offers a place for their industry not available elsewhere in London coupled with inexpensive rents. On one hand while this can contribute to an entrepreneurial spirit, on the other it can translate into a weakness from an economic standpoint.

This is contributing towards pressure for redevelopment and regeneration. Redevelopment would help alleviate housing shortages in London but careful consideration needs to be given to how any new provision of retail will impact on other neighbouring town centres such as Ealing. Similarly, redevelopment of the area is likely to give rise to local pressures from existing businesses who are likely to be unwilling to relocate.

In 2010, 18.6% of the adult population were long-term unemployed (claiming job seekers allowance for over 1 year). This figure is above the national average of 10.1% and the London-wide figure of 11.5%.

A higher than average proportion of the area's population are classified in sales and customer service occupations, process plant occupations, elementary occupations and skilled trades compared to London as a whole. Professional occupations and associate professional and technical occupations however are lower than London's average but higher than regional and national averages. This data is presented in **Table B14-1**.

Table B14-1 Employment by Occupation Jul 2011-Jun 2012

Area	Total employed 16-74	Managers Directors Senior Officials	Professional Occupations	Associate_ ProfessionalTechnical Occupations	Administrative SecretarialOccupations	Skilled Trades_Occupations	Caring Leisure Other Service Occupations	Sales CustomerService Occupations	Process Plant and Machine Operatives	Elementary Occupations
England & Wales	26,526,336	10.8%	17.4%	12.7%	11.4%	11.5%	9.4%	8.4%	7.2%	11.1%
England	25,162,721	10.9%	17.5%	12.8%	11.5%	11.4%	9.3%	8.4%	7.2%	11.1%
London	3,998,897	11.6%	22.5%	16.3%	11.7%	8.3%	7.9%	7.5%	4.7%	9.6%
Inner London	1,637,362	12.4%	25.6%	19.7%	9.7%	6.3%	7.1%	6.6%	3.3%	9.4%
Outer London	2,361,535	11.0%	20.3%	13.9%	13.0%	9.7%	8.4%	8.1%	5.7%	9.8%
Ealing	164,820	10.9%	21.0%	14.2%	10.7%	9.9%	7.5%	7.9%	6.1%	11.8%
Brent	147,461	9.6%	18.2%	12.6%	10.9%	10.6%	8.2%	9.5%	6.9%	13.5%
Hammersmith and Fulham	99,618	14.6%	27.0%	22.1%	9.6%	5.4%	6.5%	5.5%	2.5%	6.7%
Park Royal & Old Oak	2,461	8.6%	19.1%	15.7%	11.5%	11.0%	7.4%	7.8%	6.2%	12.6%

Source: OAPF Draft IIA Report, GLA, February 2015

Table B14-2 Local Industry Units by Broad Industry Group

Area	England & Wales	England	London	Inner London	Outer London	Ealing	Brent	Hammersmith and Fulham	Park Royal & Old Oak
Employed Age 16-74	26,526,336	25,162,721	3,998,897	1,637,362	2,361,535	164,820	147,461	99618	2461
Agriculture/Forestry/Fishing	0.9%	0.8%	0.1%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%
Mining/Quarrying	0.2%	0.2%	0.1%	0.2%	0.1%	0.2%	0.1%	0.3%	0.2%
Manufacturing	8.9%	8.8%	3.2%	2.2%	3.9%	4.7%	4.6%	2.3%	3.9%
Electricity/Gas/Steam/Airconditioning Supply	0.6%	0.6%	0.3%	0.2%	0.3%	0.2%	0.2%	0.2%	0.1%
Water Supply/Sewerage/Waste Remediation Activities	0.7%	0.7%	0.4%	0.2%	0.4%	0.4%	0.3%	0.2%	0.3%
Construction	7.7%	7.7%	6.6%	4.4%	8.1%	7.9%	8.9%	4.0%	8.0%
Wholesale/Retail/Trade/Repair Motor Vehicles	15.9%	15.9%	13.1%	11.0%	14.5%	14.4%	17.0%	10.6%	15.5%
Transport Storage	5.0%	5.0%	5.0%	3.5%	6.1%	7.3%	5.7%	3.2%	6.8%
Accommodation & Food Service	5.6%	5.6%	6.3%	7.4%	5.5%	6.7%	7.9%	6.8%	9.2%
Info & Communication	4.0%	4.1%	6.9%	8.2%	6.0%	8.4%	6.3%	9.6%	7.3%
Financial/Insurance	4.3%	4.4%	7.7%	9.5%	6.4%	4.1%	4.4%	9.9%	3.5%
Real Estate	1.4%	1.5%	2.0%	2.1%	1.9%	1.8%	1.8%	2.9%	2.5%
Professional Scientific Technology	6.6%	6.7%	10.9%	14.1%	8.6%	8.8%	8.4%	16.1%	7.8%
Administrative Support Service	4.9%	4.9%	5.9%	5.9%	5.8%	6.8%	6.6%	5.4%	6.4%
Public Administration/ Defence	6.0%	5.9%	5.0%	4.3%	5.5%	3.8%	3.6%	3.0%	3.3%
Education	9.9%	9.9%	9.6%	9.2%	9.9%	9.0%	8.1%	8.2%	8.7%
Health	12.5%	12.4%	10.7%	10.1%	11.2%	9.8%	10.3%	9.4%	10.1%
Other: Other	5.0%	5.0%	6.4%	7.4%	5.7%	5.7%	6.0%	7.6%	6.5%

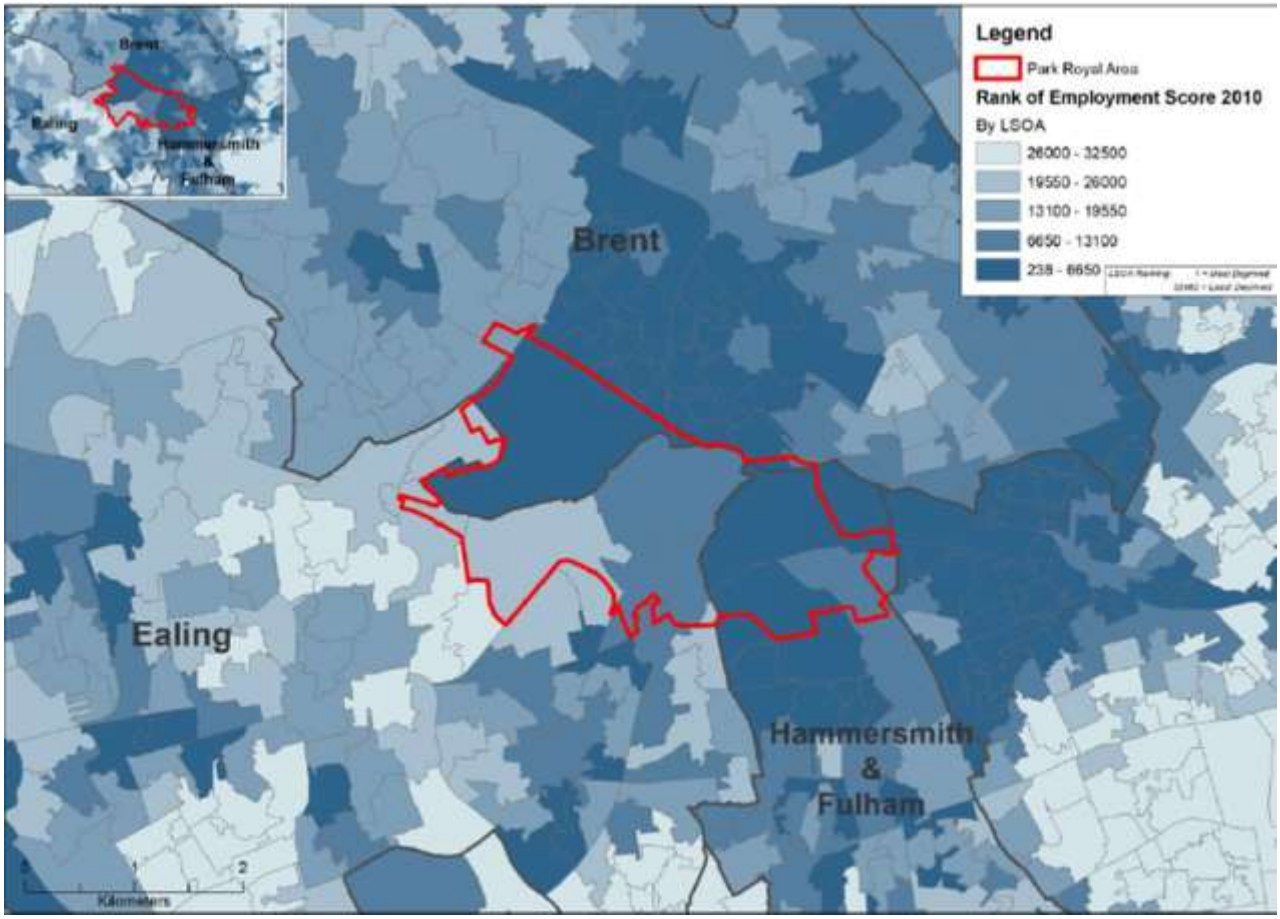
Source: OAPF Draft IIA Report, GLA, February 2015

Table B14-2 shows the employment by industry in the study area and surrounding boroughs. There's a higher than the London average of manufacturing, construction, wholesale and accommodation & food services within the Park Royal and Old Oak study area.

These more intensive industries need to be accommodated in terms of the proposed redevelopment whilst also allowing new industries to flourish – especially by providing space for green technologies.

The area ranks among the most deprived in terms of its employment deprivation as can be seen from **Figure B14-1**.

Figure B14-1 Local Industry Units by Broad Industry Group



Source: OAPF Draft IIA Report, GLA, February 2015

As such, consideration needs to be made to as how this can be addressed within the Local Plan whilst also considering how this redevelopment, its economic potential and new population increase will sit within the wider borough and London context.

B.14.2 Data Gaps and Uncertainties

- Planning consents for employment uses and take up of employment floorspace
- Noise impacts from commercial uses
- Commercial / retail rental data
- No. / % of people working from home

B.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 20% most deprived (Indices of Deprivation for England 2010).

B.15.1 OPDC Area

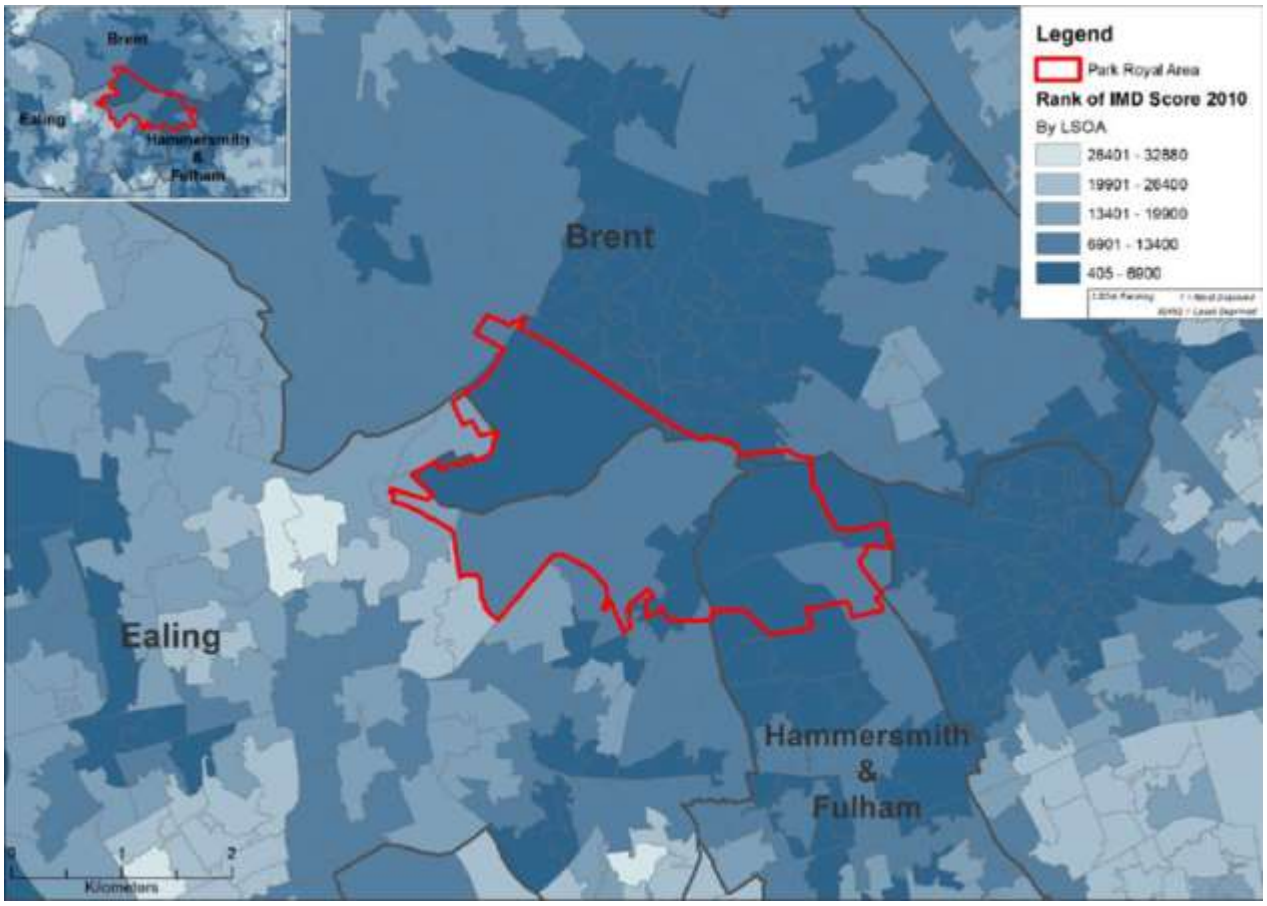
The Indices of Deprivation 2010 were published by Communities and Local Government in March 2011. The purpose of the Indices is to identify small areas of England which are experiencing multiple aspects of deprivation. It replaces the Indices of Deprivation 2007 as the official measure of

deprivation in England. Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. The ID2010 contains seven domains which relate to income deprivation, employment deprivation, health deprivation and disability, education skills and training deprivation, barriers to housing and services, living environment deprivation, and crime.

The average Indices of Multiple Deprivation (IMD) score measure reflects the average level of deprivation across LSOAs in the borough. In 2010, the study area's average IMD score ranks it has being in the most deprived LSOAs within London.

However, it's difficult to look at any trends for the study area due to the OPDC's recent formation and is made up of parts of a number of LSOAs.

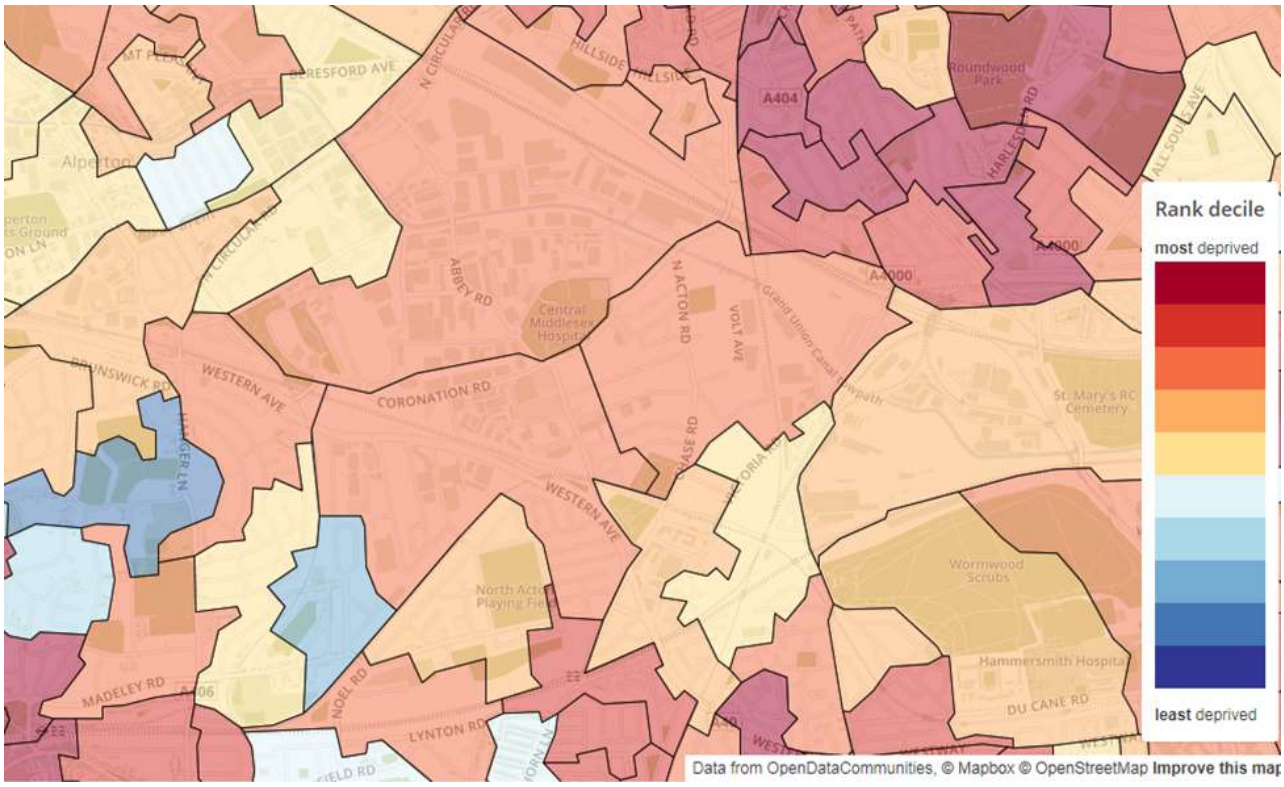
Figure B15-1 Indices of Multiple Deprivation in OPDC



Source: OAPF Draft IIA Report, GLA, February 2015

Given its largely industrial nature, it's also reasonable to assume that the small residential population coupled with its industrial make-up means that the levels of deprivation within the area may be skewed.

Figure B15-2 Overall living environment deprivation levels in OPDC



Source: Indices of Deprivation

As seen from **Figure B15-2**, what is clear irrespective of the set-up of the OPDC area is that it suffers from high levels of living environment deprivation probably due much to the fact that it is largely industrial rather mixed use or residential and this needs to be a significant consideration in the Local Plan.

B.15.2 Data Gaps and Uncertainties

- Provision of childcare
- Deprivation statistics for the area

B.16 Housing

The following baseline indicators have been used to characterise the status of housing across the borough:

- Dwelling Stock (Office for National Statistics Local Profiles)
- Household density (Office for National Statistics Local Profiles)
- Household composition (OAPF Draft IIA Report, GLA, February 2015)

The area only contains some 1,898 households, with the rest being industrial and warehouse units. Given the remit of the OPDC the housing numbers within the area is set to rise sharply in Old Oak. Currently dwelling stock suggests that compared to adjoining boroughs owner-occupiers is a lower percentage than that of Ealing and a large percentage are in private landlord's hands.

Table B16-1 Dwelling Stock by Tenure and Condition

Area	All households	Owned: Owned outright	Owned: Owned with a mortgage or loan	Shared ownership (part owned and part	Social rented: Rented from council (Local	Social rented: Other	Private rented: Private landlord or	Private rented: Other	Living rent free
England and Wales	23,366,044	30.8%	32.7%	0.8%	9.4%	8.2%	15.3%	1.4%	1.4%
England	22,063,368	30.6%	32.8%	0.8%	9.4%	8.3%	15.4%	1.4%	1.3%
London	3,266,173	21.1%	27.1%	1.3%	13.5%	10.6%	23.7%	1.3%	1.3%
Inner London	1,363,817	14.1%	19.4%	1.5%	18.8%	14.0%	29.2%	1.6%	1.5%
Outer London	1,902,356	26.2%	32.7%	1.1%	9.7%	8.2%	19.9%	1.2%	1.2%
Ealing	124,082	22.9%	28.2%	1.8%	10.5%	7.6%	26.4%	1.2%	1.5%
Brent	110,286	20.3%	22.6%	1.5%	9.7%	14.4%	28.8%	1.3%	1.4%
Hammersmith and Fulham	80,590	15.9%	18.1%	1.6%	15.7%	15.4%	30.0%	1.7%	1.5%
Park Royal & old Oak	1,898	12.9%	16.6%	7.5%	7.3%	17.1%	37.1%	1.2%	0.9%

Source: OAPF Draft IIA Report, GLA, February 2015

Household density at its most dense in the south-eastern part of the area due to the predominantly industrial use of the area itself as can be seen from **Figure B16-1**.

Figure B16-1 Household Density



Source: OAPF Draft IIA Report, GLA, February 2015

Affordable housing considerations as well as housing unit proportions (types and tenures) need to be considered in the Local Plan.

9% of households in the plan area are lone parent families and over 90% of these parents are women. The proportion of such households in the population doubles since the 1991 census. Single

parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing associated tenants).

Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income. They are more than three times more likely to be dependent on benefits than the average household, and twice as likely to be in unsuitable housing.

B.16.2 Data Gaps and Uncertainties

- Future population composition

B.17 Crossboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across boundaries. In order to help to characterise the baseline further, some of these key 'crossboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the OPDC Local Plan to contribute to reducing this trend.
- Surface water flood risk and the measures to manage this may also be a crossboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. OPDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within OPDC area is particularly important especially when consideration needs to be made with adjoining town centres as well as existing business that may not have anywhere else to go.
- There is a severe lack of open space currently in the area and in the adjacent boroughs overall - it is important that the OPDC Local Plan incorporates open space.
- Although Wormwood Scrubs and the Grand Union Canal are important biodiversity assets, other space within the area and the adjoining boroughs need to be developed. The benefits of this could be at least two-fold. The Local Plan should support the existing biodiversity but also encourage more biodiversity into other sections of the study and promote green connectivity. Green spaces need to be multi-functional and evenly located so as to avoid over-reliance on one particular space.
- Impact of significant quantum of development on the surrounding heritage assets and settings needs to be carefully managed.
- Cumulative impacts regarding major roads and the impact on the new rail infrastructure should be considered.

APPENDIX C

Consultation Responses to Draft IIA Report – Regulation 18 & Regulation 19(1)

Respondent	Relevant comment extract	Response
Hammersmith and Fulham Disability Forum	**IIA does not provide assurances that local people, vulnerable, disabled and older people from existing and new communities will benefit from the Local Plan over the next 20 years.**	No change proposed. The IIA sets out a number of objectives including 1, 5, 13, 15, 16, 17 which define elements relating to local existing and future communities, vulnerable, disabled and older people which are used to assess each policy within the Local Plan.
Historic England	**Table 3-1: Within the national documents, we would expect to see the National Planning Policy Guidance (NPPG). Historic England's Good Practice in Planning Note 'The setting of Heritage Assets'1 and advice note 'Tall Buildings'2 should also be included here. At regional level it would be suitable to include the Mayor's Supplementary Planning Guidance on Character and Context (2014).**	Change proposed. These guidance documents will be referred to in the IIA.
Historic England	**Table 3-1: We also advise that at local level the conservation area appraisals for the conservation areas within, or adjoining, the plan area should be included, where they exist – for instance, the CAA for Kensal Green Cemetery prepared by the Royal Borough of Kensington and Chelsea.**	Change proposed. These documents will be referred to in the IIA

Respondent	Relevant comment extract	Response
Historic England	**Table 3-2 – the theme for the historic environment – derived from the NPPF in Table 3-1 – requires re-wording, and appears to have muddled 'landmark' with 'landscape'. We recommend that this is amended to similar wording for the biodiversity theme: 'Conserve and enhance the historic environment including designated and undesignated heritage assets and their settings.' This is an important point as the IIA/SEA has a key role in making sure that the positive contribution of the area's cultural heritage is harnessed and that the impact of new development, particularly taller development, is assessed and harm avoided or mitigated. Therefore a stand-alone heritage theme is needed.**	No change proposed. Table 3-2 sets out common themes derived from the review of plans, programmes and environmental protection objectives of relevance to the IIA. Objective 12 sets out a specific objective used to assess policies in relation to the historic environment.
Historic England	**Section 3.6 Baseline and key sustainability issues – Appendix C - We welcome the use of the Historic Area Assessment for Old Oak. It would be helpful to identify the need for a viewpoints assessment and conservation area appraisals for the Grand Union Canal and other CAs under the data gaps heading. A further Historic Area Assessment is also in need of preparation for Park Royal.**	Noted
Historic England	**Table 3-3 Key Sustainability issues and opportunities** **Cultural heritage assets, p29 – This summary is useful, although some corrections are needed:** **- in the first bullet change 'undeclared' to 'undesignated'** **- in the key issue column - the plan area includes a proposed conservation area on the east side of Scrubs Lane.** **- the undesignated heritage assets, including the industrial, railway and canalside heritage, should be referred to for the possibilities they provide for**	Change proposed. IIA will be amended to reflect proposed changes.

Respondent	Relevant comment extract	Response
	retaining and enhancing character and distinctiveness. This is detailed in the Historic Area Assessment for Old Oak. **- The implications/opportunities column would benefit from reference to the potential impact on the setting and significance of heritage assets from taller buildings (see also comments below)**	
Historic England	Table 3-3 Key Sustainability issues and opportunities Landscape and townscape, p31 – within the implications/opportunities column, we suggest that a key issue is the disposition of the building heights, especially the siting of tall buildings. It would be good to include this more explicitly here. However, we do also recommend that this is an issue identified under the cultural heritage topic due to the close inter-relationship.	Change proposed. IIA will be amended to reflect proposed changes.
Historic England	Table 3-3 Key Sustainability issues and opportunities Landscape and townscape, p31 – Key issues: first bullet - the eastern boundary of the plan area is formed by St Mary's Cemetery, which forms a continuous landscape with the grade I historic park of Kensal Green Cemetery. Within the implications column, we consider the fifth bullet should be amended to read 'careful siting of tall buildings'	Change proposed. IIA will be amended to reflect proposed changes.

Respondent	Relevant comment extract	Response
Historic England	3.6.4 Cross-boundary considerations, p36 There are potential cross-boundary considerations in terms of the proposed scale of development - for instance, the need to understand the impacts on the setting and significance of Kensal Green Cemetery in the Royal Borough of Kensington and Chelsea from tall buildings within the Old Oak area. This will require careful analysis and management.	Change proposed. IIA will be amended to reflect proposed changes.
Historic England	Table 3-4 IIA Framework, p39 Within IIA objective 1 'To enhance the built environment and encourage 'place-making'' there should be an explicit sub-objective to ensure that the scale of new development sits comfortably within the local area and itself is a high-quality, liveable environment.	No change proposed. This aspiratoin is reflected in the penultimate sub-objective related to Lifetime Neighbourhoods.
Historic England	Table 3-4 IIA Framework, p39 The illustrations within the draft plan are currently disappointing, and do not suggest an attractive environment of any distinction. A further sub-objective should be added here to cover this – in addition to the first sub-objective with which we agree.	No change proposed. It is not considered relevant for the IIA to assess illustrative graphics within the Local Plan.
Historic England	Table 3-4 IIA Framework, p39 IIA objective 12 – We welcome the sub-objectives identified. It would be helpful to clarify that the second bullet refers to designated and undesignated assets.	Change proposed. IIA will be amended to reflect proposed changes.

Respondent	Relevant comment extract	Response
Historic England	6.3 Appraisal findings We disagree with the findings for objective 4 which seem to interpret this principally in terms of the biodiversity value of the open spaces and canal. This appears to give a different emphasis and obscures the reference to the significance of the heritage assets in the area. The recommendation consequently fails to identify the role of the heritage assets within and adjoining the area for any purpose beyond tourism and leisure. Please see Historic England's response to the draft plan and our recommended changes to objective 4.	Noted. Assessment of related content of the Regulation 19 draft Local Plan will consider the historic environment to address raised concerns.
Historic England	7. Appraisal of Regulation 18 Local Plan Policies and Options Historic England is surprised that the appraisal has not identified the potential for significant impacts on the setting of heritage assets, and most notably the setting of Kensal Green Cemetery, a grade I Historic Park and Garden containing c140 structures and monuments. The cemetery is of national significance and any impacts should be very carefully evaluated. The densities defined and mapped in the draft plan on pages 42/43 are very challenging in terms of integration with the surrounding townscape and heritage assets.	No changes proposed. Paragraphc 7.4.1. identifies that Policy D6 are predicted to deliver major effects.
Royal Borough of Kensington and Chelsea	**The Council previously submitted comments on the Integrated Impact Assessment (IIA) Scoping Report. The Council notes that these comments have been responded to and welcomes the additions/changes that have been agreed as a result by the OPDC. The Council also notes that the suggested changes to specifically mention the Grade I listed (Registered Park and Garden) Kensal Green Cemetery has not been accepted alongside the** **indicator for objective 12. However, the baseline data in Appendix C, C.10.1 does mention it. This inconsistency needs to be corrected. The Council also notes English Heritage's (now Historic England) comments supporting the attention to detail in the IIA scoping report to Heritage at Risk. They also made supportive points regarding the level of detail in section 5.4 in relation to Kensal Green Cemetery but expressed an expectation to see this consideration flow through the document.**	Change proposed. IIA will be amended to specifically mention the Grade I listed (Registered Park and Garden) Kensal Green Cemetery within Objective 12.

Respondent	Relevant comment extract	Response
Royal Borough of Kensington and Chelsea	The Council supports the identified implications/opportunities for the Local Plan in this regard as set out in Table 3-3 of the IIA. In particular (page 29) stating “Statutory sites outside the OPDC boundary also need to be protected and safeguarded, particularly in terms of their setting. Cross-boundary issues with respect to heritage assets and views need to be addressed.”	Noted.

Consultation Responses to Regulation 19(1) – Draft IIA Report

Respondent	Relevant comment extract	Response
St Quintin and Woodlands Neighbourhood Forum, Hammersmith Society, Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	The Local Plan and IIA should have tested alternative options for the capacity of homes and jobs the area could deliver, particularly a lower capacity. Hammersmith and Fulham assessed lower capacity alternatives in their Local Plan prior to OPDC's establishment, so OPDC should also have tested lower capacity alternatives.	No change proposed. Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable." The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility. Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. It should be noted that LBHF's Issues and Options consultation was undertaken in advance of the consultation on and publication of the Mayor's Old Oak and Park Royal Opportunity Area Planning Framework and in advance of the publication of the London Plan (2015).

Respondent	Relevant comment extract	Response
Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Inadequate consultation was undertaken on the IIA scoping process	No change proposed. The Scoping consultation for the IIA was carried out in accordance with Regulation 13(5) of The Environmental Assessment of Plans and Programmes Regulations 2004. This requires that when deciding on the scope and level of detail of the information that must be included in the IIA report, the responsible authority shall consult the consultation bodies. A scoping workshop was held in July 2015 with attendees from the consultation bodies and other organisations including: the Greater London Authority (GLA); Transport for London (TfL); OPDC; Historic England; the London Boroughs of Brent, Ealing, Hammersmith and Fulham and Kensington and Chelsea; Public Health England; and the Environment Agency. The outputs of this workshop informed the IIA Scoping Report. The Scoping Report was subject to a 5 week public consultation period between 4 September and 5 October 2015. All stakeholders on OPDC's consultation database, including consultation bodies, community groups and individuals, were notified.
Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha,	The "Community-Based Vision and Objectives" submitted by the Grand Union Alliance, should inform an assessment of alternatives to the current OPDC Reg 19 local plan	No change proposed. National Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess

Respondent	Relevant comment extract	Response
Lynette Hollender, Jeremy Aspinall, Thomas Dyton		the proposed community-based vision and objectives as reasonable alternatives.
Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Appendix G is missing from the IIA published for public consultation	Change proposed. Part 4.5 of the IIA refers to Appendix G in relation to mitigations measures. This was an error. Reference should have been made to Appendix D. This minor amendment has been made.

Respondent	Relevant comment extract	Response
Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton, Just Space, Old Oak Interim Neighbourhood Forum	The IIA does not accord with legislation or NPPF and NPPG guidance. Alternative strategic options or reasonable alternative options have not been tested in regulation 18 and 19 versions of the Local Plan. IIA of the overall Local Plan has not been carried out. Proposed community-based vision should be used for IIA alternative option assessment for the whole Local Plan.	No change proposed. The IIA has been developed and consulted on in accordance with the relevant legislation, national guidance and good practice guidance to identify, describe and evaluate the likely significant effects on the environment of implementing the Local Plan, including reasonable alternatives. No change proposed. The IIA and Local Plan have been developed in full accordance with the requirements of legislation, national guidance and good practice recommendations to assess reasonable alternatives and strategic options within the IIA of the Regulation 18 Local Plan. The IIA of the Regulation 19 did not assess reasonable alternatives in accordance with NPPG paragraph 013 Reference ID: 11-013-20140306. NPPG Paragraph: 001 Reference ID: 11-001-20140306 confirms that “Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation.“ Government guidance advises that only reasonable alternatives to proposals should be considered. NPPG Paragraph: 018 Reference ID: 11-018-20140306 identifies that reasonable alternatives are "the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.” The Further Alterations to the London Plan (FALP) (2015) IIA tested four pan-London options for London's growth (para. 2.3.1) and this identified the preferred option as being to accommodate growth within London's boundaries and as part of this, to consider flexibility for enhanced growth in town centres and Opportunity Areas with good public transport accessibility.

Respondent	Relevant comment extract	Response
		Old Oak and Park Royal are specifically referenced as an example of this in the supporting text. The published FALP (2015) identified a target for the Old Oak and Park Royal area to deliver a minimum 25,500 homes and 65,000 new jobs. Following the publication of the FALP in 2015, the GLA developed the Old Oak and Park Royal Opportunity Area Planning Framework (OAPF) covering the entirety of the OPDC area. This was published in November 2015. The FALP, together with the OAPF set a strategic development capacity target for the OPDC area and it would therefore not have been appropriate to test lower development capacities as reasonable alternatives, particularly as these would have not have been in general conformity with the London Plan. OPDC have also undertaken a Development Capacity Study, in accordance with NPPG guidance, which shows that the London Plan Opportunity Area targets are achievable. No change proposed. OPDC's IIA carries out a proportionate approach in its assessment in accordance with NPPF paragraph 167. Specifically, the spatial vision and narratives have been subject to a qualitative review in light of the IIA Framework objectives and an objective compatibility exercise has been used to determine if there are any key conflicts between the Local Plan Objectives and IIA Objectives. A more detailed assessment of the policies has been undertaken using an assessment matrix. These assessments are then considered in the round to provide a summary of the assessment which is set out on page iv of the IIA. However, an assessment of strategic options was carried out in the IIA for the Regulation 18 consultation following recommendations of good practice guidance. OPDC considered that the approach to affordable housing warranted assessment as a strategic option. This reflects the potential impact of the different approaches to affordable housing may have on wider placemaking and infrastructure requirements.

Respondent	Relevant comment extract	Response
		The regulation 18 Local Plan also proposed alternative policy options. These were considered to be reasonable alternatives and were assessed by the IIA for the regulation 18 Local Plan. No change proposed. The proposed community-based vision and objectives were submitted as part of the OPDC Local Plan regulation 18 consultation. The content of the proposed vision and objectives were embedded within the spatial vision, narratives and policies of the OPDC Local Plan regulation 19 consultation. As such, OPDC did not consider the vision and objectives were reasonable alternatives as they weren't sufficiently distinct from the content of the Local Plan to highlight the different sustainability implications so that meaningful comparisons can be made. In light of this the IIA did not specifically assess the proposed community-based vision and objectives as reasonable alternatives.

APPENDIX D

PREFERRED POLICIES ASSESSMENT

Table D-1: Strategic Policies

SP1: Catalyst for Growth
SP2: Good Growth
SP3: Improving Health and Reducing Health Inequalities
SP4: Thriving Communities
SP5: Economic Resilience
SP6: Places and Destinations
SP7: Connecting People and Places
SP8: Green Infrastructure and Open Space
SP9: Built Environment
SP10: Integrated Delivery

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	SP1	+	S, M, L-T, D, R, M	West London	This policy scores positively against this objective as it optimises development, including a diverse range of land uses which support West London's Growth, contributes to meeting London's needs and supports London's role as a global city and position as a global economic and cultural capital.
		SP2	++	S, M, L-T, D, R, M	OPDC area	The policy states that it aims to create vibrant, liveable, mixed, and inclusive lifetime neighbourhoods, which is important in place-making. It also directly states an aim to deliver high standards of place-making.
		SP3	+	S, M, L-T, D, R, M	OPDC area	The provision of new spaces which are included in this policy will have a positive effect against the objective.
		SP4	+	S, M, L-T, D, R, M	OPDC area	The policy aims to provide social infrastructure which is important in place-making as this will help to create thriving communities.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	++	S, M, L-T, D, R, M	OPDC area	This policy supports a coordinated and phased approach to place-making that creates a series of distinctive places and clusters delivering a range of activation uses, including meanwhile and catalyst users. This will score positively against the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SP7	+	S, M, L-T, D, R, M	OPDC area	The supporting text discusses OPDC aiming to work with a variety of stakeholders to support the delivery of new rail stations and to ensure they are well connected into their surroundings, support surrounding development and achieve high standards of design that contributes to place-making.
		SP8	+	S, M, L-T, D, R, M	OPDC area	Green infrastructure can contribute to place-making as it enhances the quality of the built environment, enhances the experience and perception of place, provides visual amenity, and helps to knit together neighbourhoods.
		SP9	+	S, M, L-T, D, R, M	OPDC area	The delivery of buildings, public realm and infrastructure of the highest design quality and architecture can play an important role in place-making.
		SP10	+	S, M, L-T, ID, R, M	OPDC area	The supporting text discusses the need of a joined-up approach across the various developments which could have an indirect positive against the objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	SP1	0			There is no clear link between the policy and the IIA Objective.
		SP2	++	S, M, L-T	OPDC area	The policy supports the delivery of the spatial vision by ensuring development occurs at appropriately high densities.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S, M, L-T, D, R, M	OPDC area	This policy aims to deliver high density and taller buildings, but only in areas considered appropriate.
		SP10	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse of previously	SP1	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	developed land and existing buildings, including the remediation of contaminated land	SP2	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP3	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP4	++	S, M, L, L-T, D, R, M	OPDC area	The policy states that 'the reservoir of supply of brownfield land means Old Oak and Park Royal can make a significant contribution towards meeting local and London-wide housing needs.' This implies that development will occur on previously developed land.
		SP5	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP6	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP7	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP8	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP9	+	S, M, L, L-T, D, R, M	OPDC area	Most of the OPDC area is already on previously developed land. It can be assumed new developments will use previously developed land thus scoring positively against this objective.
		SP10	+	SM L, L-T, D, R, M	OPDC area	The supporting text includes the treatment of contaminated land which increase the land space which can be built on, which will result in a positive against this objective.
4	Minimise the need to travel,	SP1	+	M, L-T, D, R, M	London Wide	The planned Old Oak Common station will reduce the need for travel by car and create an increased opportunity for rail transport. It will maximise the accessibility to other forms of public transport and reduce congestion traffic thus having a positive impact

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network					against the IIA objective.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	+	M, L-T, D, R, M	OPDC area	The policy states that 'Development..should…contribute to improved health and wellbeing.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	++	M, L-T, D, R, M	OPDC area	The policy supports the aim to minimise the use of travel by delivering healthy, high quality streets, which appropriately prioritise walking and cycling and which connect existing and new communities. It also aims to deliver a high quality, frequent and well connected public transport network and minimise the need for use of private vehicles.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet	SP1	+	M, L-T, D, R, M	London and Nationwide	The new station will improve access to new housing developments.
		SP2	+	M, L-T, D, R, M	OPDC area	The policy supporting text mentions the need for diverse housing, affordability and having a choice of housing for local residents. This will have a positive impact on housing being affordable and inclusive.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	++	M, L-T, D, R, M	~~OPDC area~~London wide	The policy aims to provide a range of housing tenures, types and sizes that deliver mixed and inclusive communities and to delivering at least ~~21,000~~19,~~700~~20,100 additional homes over ~~2017~~2018-~~37~~ 38 with 50%, measured in habitable rooms, as affordable homes, subject to viability which will score positively against this objective. This Policy also enables OPDC to meet its objectively assessed need as well as

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	identified local needs					contribute towards meeting housing need in the London Boroughs of Brent, Ealing and Hammersmith and Fulham and London-wide housing need
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	SP1	+	L-T, I, R, M	London wide	The supporting text states that the new station will provide opportunities to set new standards for optimising sustainable development which may help improve climate change adaptation.
		SP2	++	M, L-T, D, R, M	London wide	The supporting text recognises the issues of flooding and the heat island effects and aims to address these issues during the regeneration of the OPDC area.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	+	M, L-T, ID, R, H	OPDC area	The supporting text it shows that green infrastructure can provide a benefit against flood risk.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through	SP1	0			There is no clear link between the policy and the IIA Objective.
		SP2	+	S, M, L-T, I, R, L	OPDC area	The supporting text states that resource efficiency is important and should be addressed through careful design of infrastructure, buildings, roads, public realm, and parks.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	M, L-T, D, R, M	OPDC area	By minimising the use of private cars, and by encouraging sustainable transport, this can reduce reliance on natural resources and help reduce contributions to climate change.
		SP8	+	M, L-T, I, R, M	OPDC area	Green infrastructure can reduce greenhouse gas emissions through material substitution.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	M, L-T, I~~D~~, R, M	OPDC area	By delivering site-wide infrastructure the policy can ensure that there are energy efficiencies realised which will have a minor positive indirect effect providing policy can be implemented effectively.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use,	SP1	0			There is no clear link between the policy and the IIA Objective.
		SP2	+	S, M, L-T, D, R, M	OPDC area	The inclusion of resource efficiency in design will help minimise production of waste thus scoring positively against this objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	S, M, L-T, D, R, M	OPDC area	The supporting text discusses circular economy and reuse of construction waste which will have a positive effect against this objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recycling and recovery rates as well as composting of all green waste	SP10	+	S, M, L-T, D, R, M	OPDC area	By looking at integrated strategies for the area (ie site wide or multi-developer) approaches, this could maximise efficiencies for waste streams and score positively against this objective.
9	Improve the quality of the water environment	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to the pollution of water bodies during construction and post construction. However, these negatives are mitigated against through SP6, SP8 and the Environment and Utilities Chapter.~~-~~
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	+	S, M, L-T, D, R, M	OPDC area	The supporting text explores provisions for high quality ~~SuDS~~ environments which could ~~will~~ help to improve the quality of the water environment.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	+	S, M, L-T, D, R, M	OPDC area	The supporting text explores provisions for high quality SuDS which will help to improve the quality of the water environment.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to damage and destruction to biodiversity during construction and post construction. However, these negatives are mitigated against through SP6, SP8, SP10 and the Environment and Utilities Chapter...
		SP2	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	habitats across the area and its surroundings	SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	+	S, M, L-T, D, R, M	OPDC area	The policy supports the creation of high-quality environments which could~~green infrastructure and the planting of mature trees which will~~ enable ~~create~~ and enhance biodiversity and the diversity of habitats across the area and its surroundings.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	++	S, M, L-T, D, R, H	OPDC area	Green infrastructure will create new areas of biodiversity. This will also enhance existing biodiversity and the diversity of habitats across the area and its surroundings. Policy also sets out to achieve an overall net gain in biodiversity resulting in a major positive score against this IIA objective.~~.~~
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T, I, R, M	OPDC area	The supporting text refers to strategic green space provision. Site wide integrated strategies can have in indirect positive effect against the IIA objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to air, noise and light pollution during construction and post construction. However, these negatives are mitigated against through SP2, SP7, SP8, SP9, SP10, D6 and the Environment and Utilities Chapter.
		SP2	+	S, M, L-T, D, R, H	OPDC area	The supporting text recognises the issue of air pollution and aims to address these issues during the regeneration of the OPDC area.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	S, M, L-T, D, R, H	OPDC area	By encouraging sustainable transport this will help to reduce air and noise pollution in particular, as it encourages less people to drive. Less vehicles will result in reduced noise and air pollution.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S, M, L-T, D, R, H	OPDC area	This policy states that minimisation of air, light and noise pollution is important in amenity, but this is explored more in the environment chapter.
		SP10	+	S, M, L-T, D, R, H	OPDC area	This policy will mitigate against any impacts it creates, this includes, light, noise and air pollution from construction. Details can be found in OPDC's infrastructure delivery plan.
12	To conserve and enhance the historic environment, heritage assets and their settings	SP1	-	S, M, L-T, D, R, M	OPDC area	New development can lead to damage of heritage assets and their setting if not appropriately designed and conserved. However, these negatives are mitigated against through SP6, SP9 and D8.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	0			There is no clear link between the policy and the IIA Objective.
		SP6	+	S, M, L-T, D, R, H	OPDC area	This policy recognises the heritage context within OPDC and aims to use the local heritage, along with other resources to ensure that new development creates vibrant and distinctive places and neighbourhoods, which respond to and celebrate existing features.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	++	S, M, L-T, D, R, H	OPDC area	This policy aims to conserve and enhance the historic environment thus scoring a major positive against this objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a	SP1	+	S,M,L-T, I, R, M	London Wide	The new station can increase connectivity between areas to create social linkages with the surrounding communities and with the whole of London which will score positively against this objective.
		SP2	+	S,M,L-T, I, R, M	London Wide	The policy aims to proactively engage with and deliver benefits to local communities which will increase community cohesion and reduce social exclusion.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	sense of community and welfare	SP3	+	S,M,L-T, I, R, M	London Wide	By promoting health and wellbeing this can help to encourage a sense of community and welfare and reduce social exclusion. It can encourage the population to go outside more and interact with others more frequently.
		SP4	+	S,M,L-T, I, R, M	London Wide	The policy is directly about thriving communities. It aims to achieve social integration. The new social infrastructure developments will act as meeting places for members of the public to meet and interact.
		SP5	+	S,M,L-T, I, R, M	London Wide	Employment and training opportunities for locals which are discussed in this policy can seek to reduce social exclusion within the community
		SP6	+	S,M,L-T, I, R, M	London Wide	New infrastructure which includes shopping provision and open spaces can improve the quality of public realm and create social linkages.
		SP7	+	S,M,L-T, I, R, M	London Wide	Using the Healthy Streets Approach to improve the environment for walking and cycling and improving public transport linkages can enable cohesion. This will result in more space being dedicated to the provision of a high quality public realm and green infrastructure provision. This will increase community cohesion and reduce social exclusion.
		SP8	+	S,M,L-T, I, R, M	OPDC area	Provision of good quality green infrastructure can facilitate social interaction and increase community cohesion.
		SP9	+	S,M,L-T, I, R, M	London Wide	High quality design can help encourage community cohesion.
		SP10	0			There is no clear link between the policy and the IIA Objective.
14	Improve safety and reduce crime and the fear of crime	SP1	+	S,M,L-T, I, R, M	OPDC area	The majority of wards in the OPDC area are high crime rates. Increasing development and through careful consideration of design can help to improve safety and reduce crime.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		SP5	+	S,M,L-T, I, R, M	OPDC area	Delivery of a resilient and fair economy which increases employment and training opportunities for local people can contribute to reductions in crime and the fear of crime.
		SP6	0			There is no clear link between the policy and the IIA Objective.
		SP7	+	S,M,L-T, I, R, M	OPDC area	Using the Healthy Streets ~~Approach~~ Indicators to improve the environment for walking and cycling and improve public transport contributes to reductions in crime and the fear of crime. Policy also makes specific reference to delivering a safe transport network.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	+	S,M,L-T, I, R, M	London Wide	High quality design can incorporate safety measure in order to reduce the fear of crime.
		SP10	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	SP1	+	S, M, L-T, D, R, L	London wide	The new station will help to improve access to employment and training which in turn will maximise the social and economic wellbeing of the local and regional population.
		SP2	+	S, M, L-T, D, R, M	OPDC area	One of the main objectives of this policy is to promote health, wellbeing and active lifestyles which will score positively against this objective.
		SP3	++	S, M, L-T, D, R, M	OPDC area	The whole policy is targeted at improving health, wellbeing and healthy lifestyles so will have a major positive score against this objective.
		SP4	+	S, M, L-T, D, R, M	OPDC area	Thriving communities and cohesion can benefit mental and physical health and well-being. Delivering a high percentage of affordable housing will contribute to reducing health inequalities.
		SP5	+	S, M, L-T, D, R, M	OPDC area	By improving economic resilience, this can have a positive benefit on physical and mental health. However, it is important that the development creates employment and training opportunities for local people, specifically focusing on disadvantaged groups otherwise the policy could widen health inequalities.
		SP6	+	S, M, L-T, D, R, M	OPDC area	A mix of uses will create a walkable environment and provide focal points for social interaction which will have positive impacts on mental and physical health and well-

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						being.
		SP7	+	S, M, L-T, D, R, M	OPDC area	The provision of healthy streets ~~is~~ mentioned in the supporting text can help to promote healthy living. This policy aims to deliver a high-quality environment for walking and cycling and minimise the need to travel by motorised vehicles. Improving the environment for walking and cycling enables people to increase their level of physical activity which improves mental and physical health and well-being.
		SP8	++	S, M, L-T, D, R, M	OPDC area	Green infrastructure provides spaces for people to relax, escape and re-connect with nature, encourages active life styles, promotes and provides spaces of play for all ages. Good quality green infrastructure can also facilitate social interaction and increase community cohesion.
		SP9	+/-	S, M, L-T, ID, R, M	OPDC area	Delivering high densities and tall buildings could limit amounts of daylight and sunlight, and cause overshadowing, lack of privacy and noise disturbance which can have a negative impact on mental and physical health and well-being. However, the policy specifies that appropriate standards of amenity are ensured in accordance with relevant OPDC L~~l~~ocal P~~p~~lan policies and also the Mayor's London Plan~~,~~ which aims to mitigate the negative impacts of high densities and tall buildings~~.~~
		SP10	0			There is no clear link between the policy and the IIA Objective.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	SP1	+	S, M, L-T, D, R, L	London wide	The new station and surrounding commercial area will help to improve access to employment and training.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	+	S, M, L-T, D, R, M	OPDC area	The creation of new jobs will also lead to the increase of skills training for the local population. OPDC is working with educational institutions to support local training and employment initiatives, both during and post construction. It is important that the employment and training opportunities for local people are specifically focussed on

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						disadvantaged groups otherwise the policy could widen inequalities.
		SP6	+	S, M, L-T, D, R, M	OPDC area	The supporting text of the policy explores potentials for education facilities which will help to improve education and skill levels for members of the public.
		SP7	0			There is no clear link between the policy and the IIA Objective.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	0			There is no clear link between the policy and the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	SP1	+	S, M, L-T, D, R, L	London wide	The new station and surrounding commercial area will help to improve access to employment and training which in turn will maximise the social and economic wellbeing of the local and regional population.
		SP2	0			There is no clear link between the policy and the IIA Objective.
		SP3	+	S, M, L-T, D, R, L	London wide	The policy focuses on improving health and wellbeing, reducing health inequalities and enabling healthy lifestyles which will help to maximise the social and economic wellbeing of the local population.
		SP4	0			There is no clear link between the policy and the IIA Objective.
		SP5	++	S, M, L-T, D, R, L	London wide	The creation of new jobs and employment centres will help maximise the economic wellbeing of the local and reginal population.
		SP6	+	S, M, L-T, D, R, L	London wide	The supporting text states the aim to meet a jobs target which will have a positive effect on this IIA objective. The policy also plays an important role in place-making which can have benefits for social well-being.
		SP7	+	S, M, L-T, D, R, L	OPDC area	Improving the environment for walking and cycling and improving public transport will improve access to employment and training.
		SP8	+	S, M, L-T, D, R, L	OPDC area	Green infrastructure can promote social interaction which in important in maximising the social wellbeing of the local population.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T,	OPDC area	The policy plays an important role in place-making which can have benefits for social

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				D, R, L		well-being.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	SP1	+	S, M, L-T, D, R, L	London wide	The proposals in the policy and in the supporting text states that the new investment will provide opportunities to deliver economic growth not just in the OPDC area but also in London as a global city and the UK.~~.~~
		SP2	+	S, M, L-T, D, R, L	London wide	The policy recognises the need for the development of sustainable economic growth focusing on delivering ~~.~~high quality development in parallel with the environmental and social strands of sustainability.
		SP3	0			There is no clear link between the policy and the IIA Objective.
		SP4	+	S, M, L-T, D, R, L	London wide	By creating new housing, areas which become more populated can attract investors and contribute to sustainable economic growth.
		SP5	++	S, M, L-T, D, R, L	London wide	By creating over 60,000 jobs in the OPDC area this will encourage inward investment alongside investment within existing communities to create sustainable economic growth.
		SP6	+	S, M, L-T, D, R, L	OPDC area	By delivering and supporting a new town centre hierarchy, it can encourage more inward investment in town centres within OPDC.
		SP7	+	S, M, L-T, D, R, L	OPDC area	More sustainable transport and better linkages throughout OPDC area and from OPDC to other areas can encourage inward investment.
		SP8	0			There is no clear link between the policy and the IIA Objective.
		SP9	0			There is no clear link between the policy and the IIA Objective.
		SP10	+	S, M, L-T, D, R, L	OPDC area	The policy supporting text discusses CIL and s106 payments which is a means of attracting inward investment. This will score positively against the objective.

Table D-2 Places, clusters and site allocations

Each policy, any associated clusters and their site allocations are in a separate table below.

P1: Old Oak South
- P1C1 Old Oak Common Station

P2: Old Oak North
- ~~P2C1 Grand Union Square~~

P3: Grand Union Canal

P4: Park Royal
- P4C1 Coronation Road

P5: Old Park Royal

P6: Park Royal Centre
- ~~P6C1 ASDA~~

P7: North Acton
- P7C1 North Acton Station
- P7C2 Old Oak Common Lane Station

P8: Victoria Road & Old Oak Lane
- P8C1 Atlas Junction

P9: Channel Gate

P10: Scrubs Lane
- P10C1 Harrow Road
- P10C2 Laundry ~~Lane~~
- P10C3 Hythe Road
- P10C4 Mitre Canalside

P11: Willesden Junction

P12: Wormwood Scrubs

P1: Old Oak South
P1C1: Old Oak Common Station
Site Allocations ~~10~~1

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	~~As stated in the supporting text, the area specific policy should help to deliver a strong sense of place through development, reflecting and building upon the area's existing character.~~ The vision for the area highlights that Old Oak South will see a new commercial ~~hub~~centre, centred on the new Old Oak Common Station. The station, along with a new London Overground station on Old Oak Common Lane, will be integrated into its surroundings, providing visitors, employees and residents with easy access to west London and the OPDC regeneration area. Bounded by Wormwood Scrubs and the Grand Union Canal, these may contribute to the creation of a unique sense of place. The land uses supported in the policy text should help to support the creation of a sense of place, leading to the prediction of significant positive effects against this objective. As the majority of Old Oak South is likely to come forward for development post-2026, medium to long term effects are predicted.
		P1C1	++	M, L-T, I, R, M	Old Oak South and OPDC area	This cluster policy provides more clarity on the interface aspects of the public realm of Old Oak Common Station with the station square and beyond. By providing a steer on how this should be delivered, a greater sense of place-making could be achieved.
		Site A 1~~0~~	+	S, M-T, I, R, M	Old Oak South and OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P1	~~++~~	M, L-T, I, R, M	Old Oak South and OPDC area	The policy specifies the areas where high densities will be encouraged across the area. This could lead to benefits against this IIA Objective.
		P1C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 1~~0~~	+	M, L-T, I, R, M	Old Oak South and OPDC area	~~Policy P1~~The vision aims to encourage high density buildings. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P1	++	M, L-T, I, R, M	Old Oak South and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P1C1	+	M, L-T, I, R, M	Old Oak South and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 1~~0~~	+	M, L-T, I, R, M	Old Oak South and OPDC area	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P1	++	M, L-T, D, R, M	OPDC area, London wide	~~Supporting text to the policy highlights that walking and cycling access within the area is very constrained, which restricts movements to the north/south and east/west.~~ The vision for Old Oak South includes that the area will be focussed on a new Old Oak Common station and a new London Overground station. In addition, the policy aims to contribute to 'the delivery of a permeable, inclusive and accessible street network to improve access' This could lead to significant benefits against this objective through encouraging the use of non-motorised transport across the area. Further significant benefits may be realised from the supporting of new rail, bus, taxi and cycle infrastructure and ensuring that these integrated with their surroundings, including the provision pedestrian and cycle access to Wormwood Scrubs. The policy aims to ensure that Old Oak Common Station will be delivered on time.
		P1C1	++	M, L-T, D, R, M	OPDC area, London wide	The policy describes the further detail around the public realm and movement associated with the station which in turn would support the Objective around non-motorised transport
		Site A 1~~0~~	+	M, L-T, I, R, M	OPDC area, London wide	Policies P1 and P1C1 aim to minimise the need to travel and provide new stations. The site allocations in this area will therefore be situated near good sustainable transport, walking, and cycling links. They aim to add alternative employment opportunities, service and amenities. This in turn will reduce needed to travel.
5	Improve access	P1	~~++~~+	M, L-T, D, R,	OPDC area	The policy wording specifies ~~that developments that~~ that the delivery of new residential

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs			M		development across the whole of Old Oak South will be supported, which ~~could~~ would lead to positive effects against this objective.
		P1C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 1~~0~~	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P1	+/-	S, M, L-T, D, IR, L	OPDC area	A significant increase in the ~~density of~~ development could lead to an increase in hardstanding and built development, which could have negative effects in relation to surface water and sewer flooding if not adequately mitigated through flood management and design as suggested in the Environment and Utilities Chapter. The policy text does not specifically refer to flooding or heat island though it mentions climate change mitigation and adaptation. This could lead to positive effects against this objective.
		P1C1	+/-	S, M, L-T, D, IR, L	Old Oak South	Open spaces are proposed to mitigate and adapt to climate change are discussed in policy text, but how this could be achieved is defined in the Environment and Utilities Chapter.
		Site A 1~~0~~	+/-	S, M, L-T, D, IR, L	Old Oak South	The allocation sites are located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective is not appropriately mitigated through guidance in the Environment and Utilities Chapter.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P1C1	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	The cluster aims to support the growth of the station and ensure it acts as a catalyst for wider neighbourhood development. Focussing development around new train infrastructure could minimise contributions to climate change. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 1~~0~~	+/-	M, L-T, D, R, M	OPDC area, London wide and nationally	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use,	P1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P1C1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 1~~0~~	+/-	M, L-T, D, R, M	OPDC area and	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recycling and recovery rates as well as composting of all green waste				surrounding boroughs	programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the quality of the water environment	P1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide access to green infrastructure associated with the new railway interchange and away towards Wormwood Scrubs and connections towards Grand Union Canal. This could provide an opportunity for the positive management of water quality in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		P1C1	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide access to green infrastructure associated with the new railway interchange and away towards Wormwood Scrubs and connections towards Grand Union Canal. This could provide an opportunity for the positive management of water quality in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		Site A 1~~0~~	+/-	M, L-T, D, IR, M	OPDC area and surrounding boroughs	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and water management facilities. This could provide an opportunity for the positive management of water quality in these areas.
10	Create and enhance biodiversity and the diversity of habitats across the area and its	P1	+/-	M, L-T, D, IR, M	OPDC area	The place includes a designated nature reserve to the southern edge of the Grand Union Canal. The policy seeks to ~~celebrate the unique character of the Grand Union Canal and associated~~enhance the Birchwood nature reserve as well as providing a network of connected open spaces for the diverse population. This could provide an opportunity for the positive management of biodiversity in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	surroundings					Utilities Chapter. *The ongoing management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects on biodiversity arise from its development. Appropriate policies in the Environment and Utilities chapter will ensure this.*
		P1C1	+/-	M, L-T, D, IR, M	OPDC area	The policy refers specifically ~~to canopy trees for planting as part of the station square proposals,~~ the delivery of new public open spaces but makes no specific links with what biodiversity could be created and encouraged as a result (e.g. native species, species suitable for birds/bats and pollinators). By increasing pedestrian access to Wormwood Scrubs, the existing biodiversity in this nature reserve could be negatively impacted if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		Site A 1~~0~~	+	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P1	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P1C1	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term.
		Site A 1~~0~~	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
12	To conserve and enhance the historic environment, heritage assets and their settings	P1	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will conserve and enhance the Grand Union Canal, and that it becomes an accessible focal point for the area as well as historic railway context and Wormwood Scrubs. This could provide some benefits against this objective.
		P1C1	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy and supporting text states that the area's ~~rich~~ railway heritage will inform the context of future development of the immediate area surrounding the statio~~n~~. This could provide some benefits against this objective.
		Site A 1~~0~~	+	S, M, L-T, I, IR, M	OPDC area and surrounding boroughs	Site allocations are situated near heritage assets which provides an opportunity for development conserve and enhance the historic environment.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P1	++	M,L-T, I, R, M	Old Oak South, OPDC area and neighbouring boroughs	The policy seeks to ensure ~~the delivery of a sense of place~~future local character is informed by the area's existing character and improve connectivity across the area, which could improve community interaction. This could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses.
		P1C1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a station destination that will ensure that people will want to congregate in the area, which could help increase a sense of community though it does explicitly refer to this.
		Site A 1~~0~~	+	M,L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
14	Improve safety and reduce crime and the fear of crime	P1	+	M,L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a permeable street network that will help to create an accessible environment which indirectly could help to improve safety. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses, which could reduce the potential for anti-social behaviour.
		P1C1	+	M,L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that in designing a new ~~world-class~~state of the art station, these elements will be taken into account in the station design and its evolving urban context.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 1~~0~~	+	M,L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that in high quality design which has been included in policy P1C1 supporting text will be applied to the allocation sites.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P1	++	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver ~~a range of~~ social infrastructure ~~including but not restricted to a new primary school, community hub facility and public access sports and leisure centre all of~~ which could contribute to positive impacts on mental health and physical wellbeing. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area this could have positive benefits against this objective. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. Access to green space could also provide both physical and mental health benefits. Some negative effects on health during the construction period may result from noise and air pollution if not adequately managed.
		P1C1	+	M, L-T, I, R, M	Old Oak South and OPDC area	The policy seeks to deliver a high quality environment within and around the station including green infrastructure. These elements could indirectly deliver benefits against this IIA Objective.
		Site A 1~~0~~	+	M, L-T, I, R, M	Old Oak South and OPDC area	It can be assumed that site allocations delivering housing will include elements of affordable housing in accordance with the Housing Chapter and open space in accordance with the Environment and Utilities Chapter. The sites are also located near proposed sustainable transport opportunities and walking/cycling routes which may encourage exercise and also make access to health facilities more efficient. These elements can provide mental and physical health benefits.
16	To improve the	P1	+	M,L-T, I, R, M	OPDC area	The policy seeks to deliver social infrastructure ~~including a new primary school~~.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	education and skills levels of all members of the population, particularly vulnerable groups				and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P1C1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 1~~0~~	+	M,L-T, I, R, L	OPDC area and surrounding boroughs	Deliver of housing set out in site allocations will support the delivery of educational facilities through planning contributions.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver social infrastructure that could include training facilities. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to positive effects against this Objective.
		P1C1	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 1~~0~~	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.
18	To encourage inward investment	P1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The Policy seeks to deliver space for new jobs, support catalyst uses as well as delivering commercial space and new retail and other town centre uses. This could encourage inward investment in the area. ~~The requirement for the Harlesden Enhancement Strategy will support the continued functioning of Harlesden District Town~~

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	alongside investment within existing communities, to create sustainable economic growth					~~Centre to the north.~~ The policy also supports the redevelopment of all existing infrastructure, rail and industrial uses, which could have significant benefits against this objective.
		P1C1	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	This policy builds on the Place policy by providing additional clarity on how Old Oak Common station will become a major catalyst for the regeneration of the area.
		Site A 1~~0~~	+	M, L-T, I, R, L	OPDC area and surrounding boroughs	Providing new, high quality homes and space for jobs in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.

P2: Old Oak North
Site Allocations ~~8 and 9~~7, 8 and 9

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P2	++	S, M-T, I, R, M	OPDC and surrounding area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier stages of the regeneration of Old Oak. The development will be residential-led with a mix of town centre uses. The future population will benefit from a new network of streets, open spaces and associated community infrastructure embedded into new buildings and in accessible locations. Early phases of development will be supported by a range of meanwhile uses and employment space that will help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration. This could lead to significant benefits against this objective.
		~~Site A 8~~Site A 2	+	S, M-T, I, R, M	OPDC and surrounding area	By delivering new homes and space for new jobs, site allocations will support place-making.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~Site A 9~~Site A 3	+	S, M-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M-T, I, R, M	OPDC and surrounding area	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P2	++	S, M-T, I, R, M	OPDC and surrounding area	The vision for the area highlights that densities in Old Oak North will include high density development in areas with good public transport access and facilities, with lower density development in sensitive areas such as the canal. This could lead to the efficient use of land in this area.
		~~Site A 8~~Site A 2	+	S, M-T, I, R, M	OPDC and surrounding area	The quantum of new homes and space for new jobs within Old Oak North suggests that development within site allocations will be of high density. This could lead to the efficient use of land in this area.
		~~Site A 9~~Site A 3	+	S, M-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M-T, I, R, M	OPDC and surrounding area	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P2	+	S, M-T, I, R, M	OPDC and surrounding area	The whole of OPDC is in an area of previously developed land. It is likely that remediation will be required given the historic uses present on site, but this isn't stated in the policy or the supporting text.
		~~Site A 8~~Site A 2	+	S, M, L-T, I, R, M	OPDC and surrounding area	All development in the OPDC area is on previously developed land, so these allocations will score positively against this objective.
		~~Site A 9~~Site A 3	+	S, M, L-T, I, R, M	OPDC and surrounding area	
		Site A 4	+	S, M, L-T, I, R, M	OPDC and surrounding area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P2	++	M, L-T, D, R, M	OPDC and surrounding area	At present, access from the existing Willesden Junction Station to Old Oak North is poor. Old Oak North also doesn't include any continuous east-west links. The policy seeks to facilitate the delivery of a network of unique and connected neighbourhoods and a potential new Hythe Road Overground Station on the West London line. Contributing to the new Old Oak ~~High~~ Street and Park Road, providing better connections across the area should improve accessibility significantly. Policy also commits to the delivery of a range of town centre uses along key routes therefore improving accessibility essential services and amenities and minimising the need to travel.
		~~Site A 8~~Site A 2	+	M, L-T, D, R, M	OPDC and surrounding area	The new homes and jobs provided by the site allocations will facilitate the new Hythe Road Station and the new street network.
		~~Site A 9~~Site A 3	+	M, L-T, D, R, M	OPDC and surrounding area	
		Site A 4	+	M, L-T, D, R, M	OPDC and surrounding area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P2	++	S, M-T, D, R, M	OPDC area	The vision for the area highlights that Old Oak North will be redeveloped in the earlier states of the regeneration of the wider OPDC, and ahead of Old Oak South. The development will be residential-led with a mix of town centre uses. Old Oak North will make a 'significant' contribution to the area's housing need.
		~~Site A 8~~Site A 2	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		~~Site A 9~~Site A 3	+	S, M-T, D, R, M	OPDC area	
		Site A 4	+	S, M-T, D, R, M	OPDC area	
6	Improve climate	P2	+/-	S, M, L-T, D,	OPDC area	~~The policy specifies that development should seek to overcome current surface water~~

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect			R, L		~~flooding issues to the north of the West London Line.~~To address surface waterflooding, the supporting text identifies that open spaces and green infrastructure will play an important role. This could lead to positive effects against this objective. However, how this might be achieved is not specified (this is set out in the Environment and Utilities Chapter), although the issues are described as 'significant' in the supporting text, leading to low certainty in the prediction of effects.
		~~Site A 8~~Site A 2	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	The allocation sites is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective is not appropriately mitigated through guidance in the Environment and Utilities Chapter.
		~~Site A 9~~Site A 3	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	
		Site A 4	+/-	S, M, L-T, D, IR, L	OPDC and surrounding area	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport,	P2	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		~~Site A 8~~Site A 2	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		~~Site A 9~~Site A 3	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	
		Site A 4	+/-	S, M-T, D, R, M	Old Oak North and OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heating and energy					
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P2	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP1 regarding innovation, including supporting the Circular Economy. The Powerday waste site will be protected through this policy, which could reduce the potential impact from the regeneration on the surrounding boroughs as these may otherwise have received the displacement of such as facility. The delivery of an energy centre within the area may comprise an energy from waste facility, which could help to reduce waste arising from regeneration from the OPDC area.
		~~Site A 8~~Site A 2	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP1 regarding innovation, including supporting the Circular Economy.
		~~Site A 9~~Site A 3	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 4	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Delivering building heights that appropriate respond to ~~Lower density development near to~~ sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on water quality in this area. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~Site A 8~~Site A 2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and water management facilities. This could provide an opportunity for the positive management of water quality in these areas. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		~~Site A 9~~Site A 3	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P2	+/-	S, M, L-T, D, IR, M	Old Oak North	Delivering building heights that appropriate respond to ~~Lower density development near to~~ sensitive uses such as the Grand Union Canal, may help to reduce the potential impact from development on biodiversity in this area. Policy also seeks to enhance railway embankments if they are retained to increase visual amenity and provide biodiversity value in accordance with policy EU2. This could provide some benefits against this objective. Open spaces to be provided may include enhancements for biodiversity in the 'soft' spaces to be provided. However, new vehicle connections across the Grand Union Canal may lead to some negative effects from pollution run off if not appropriately mitigated through policies in the Environment and Utilities Chapter.
		~~Site A 8~~Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		~~Site A 9~~Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
11	To minimise air, noise and light pollution, particularly for	P2	+/-	S, M, L-T, D, R, M	Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance. Supporting

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	vulnerable groups					text highlights that air quality and noise issues are generated from the Powerday waste facility and from rail uses and that new development will need to be clearly demonstrated how design has successfully mitigated these issues. The development of a potential energy from waste facility within the area as identified in the justification text may also increase air pollution locally if not mitigated adequately.
		~~Site A 8~~Site A 2	+/-	S, M, L-T, D, R, L	Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance
		~~Site A 9~~Site A 3	+/-	S, M, L-T, D, R, L	Old Oak North	
		Site A 4	+/-	S, M, L-T, D, R, L	Old Oak North	
12	To conserve and enhance the historic environment, heritage assets and their settings	P2	++	S, M, L-T, D, IR, M	Old Oak North	Supporting text to the policy highlights that the Grand Union Canal is a designated Conservation Area. The policy specifically states that supported developments will conserve and enhance heritage assets including the Grand Union Canal and Rolls Royce Building. This could provide some benefits against this objective.
		~~Site A 8~~Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	Site allocations are situated near heritage assets which provides an opportunity for development conserve and enhance the historic environment.
		~~Site A 9~~Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
13	Increase community cohesion and	P2	+	S, M, L-T, D, IR, M	Old Oak North	The policy seeks to deliver high quality, residential-led development alongside the delivery of town centre uses. The policy also seeks that density considerations are mindful of existing residential communities in the area. This should deliver benefits against this objective, however, the types of town centre uses are not specified.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	reduce social exclusion to encourage a sense of community and welfare	~~Site A 8~~Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
		~~Site A 9~~Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
14	Improve safety and reduce crime and the fear of crime	P2	+	S, M, L-T, D, IR, M	Old Oak North	The policy seeks to deliver a permeable street network that will help to create an accessible environment which indirectly could help to improve safety. Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses, which could reduce the potential for anti-social behaviour.
		~~Site A 8~~Site A 2	+	S, M, L-T, D, IR, M	Old Oak North	It can be assumed that in high quality design which has been included in policies~~y~~ ~~P1C1~~ D2 and D4 supporting text will be applied to the allocation sites.
		~~Site A 9~~Site A 3	+	S, M, L-T, D, IR, M	Old Oak North	
		Site A 4	+	S, M, L-T, D, IR, M	Old Oak North	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy	P2	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver~~-~~ access to new green open spaces that could also provide both physical and mental health benefits. ~~seeks the delivery of a health hub. Alongside measures to ensure the delivery of a sense of place and improve connectivity across the area, which could improve community interaction, this could have positive benefits against this objective.~~ Further benefits may also be realised through the supporting of the creation of community space as part of the town centre uses. Accessibility to health services and physical activity may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. Long term potential air quality benefits may also have benefits for health. ~~Access to green space could also provide both physical and mental health benefits.~~ Some negative

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	living					effects on health during the construction period may result from noise and air pollution if not adequately managed.
		~~Site A 8~~Site A 2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations delivering housing will include elements of affordable housing in accordance with the Housing Chapter and open space in accordance with the Environment and Utilities Chapter. The sites are also located near proposed sustainable transport opportunities and walking/cycling routes which may encourage exercise and also make access to health facilities more efficient. These elements can provide mental and physical health benefits.
		~~Site A 9~~Site A 3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The supporting text to the policy seeks to deliver social infrastructure ~~including a new primary school~~. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		~~Site A 8~~Site A 2	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as education facilities, contained within it, but it's uncertain at this level of detail how likely this will be. However, accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		~~Site A 9~~Site A 3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	S, M, L-T, I, R, M	OPDC area and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P2	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	The supporting text to the policy seeks to deliver social infrastructure that could include training facilities. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to positive effects against this Objective.
		~~Site A 8~~Site A 2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.
		~~Site A 9~~Site A 3	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	
18	To encourage inward investment alongside investment within existing communities, to create sustainable	P2	++	M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy wording encourages flexible workspace typologies at locations adjacent to transport or utilities infrastructure. The requirement for the Harlesden Enhancement Strategy will support the continued functioning of Harlesden District Town Centre to the north. This should help to provide benefits against this objective. Further benefits in terms of connections to Harlesden town centre, could further deliver sustainability benefits.
		~~Site A 8~~Site A 2	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	economic growth	~~Site A 9~~Site A 3	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 4	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	

P3: Grand Union Canal

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P3	++	S, M, L-T, I, R, L	OPDC area and London wide	The vision for the Grand Union Canal states that it will be ~~central to creating a new part of London in Old Oak and enhancing Park Royal as a thriving industrial area.~~a defining feature of both Old Oak and Park Royal. The policy states that the land along the canal will deliver housing and employment uses along its length in Old Oak, and industrial uses and ancillary uses with active and positive frontages at ground floor level in Park Royal. This should help to create a sense of place.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P3	++	S, M, L-T, I, R, M	OPDC area	The policy specifies areas for different uses and a range of building heights reflecting the canal's heritage and biodiversity designations and the street network. This could lead to benefits against this Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P3	++	S, M, L-T, I, R, M	OPDC area	The OPDC area is already on previously developed land. This means that the majority of new developments will maximise the reuse of previously developed land.
4	Minimise the need to travel, improve	P3	++	S, M, L-T, I, R, M	OPDC area	~~The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the towpath for walking, cycling and recreation.~~ The canal itself is not currently

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network					extensively used for transport and is home to a community of residential moorings. The ~~vision~~ policy sets out that development in this area will provide a ~~safe and convenient~~ high quality walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond. New bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. This is reflected in the policy wording, with the addition of the use of the canal for leisure uses. This could lead to significant benefits against this objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P3	+/-	S, M, L-T, D, R, M	Grand Union Canal	The canal itself is not currently extensively used for transport and is home to a community of residential moorings. The ~~vision~~ policy sets out that new bridge crossings will support easier north/south movement while the canal itself will be promoted and used for the transport of people and freight. The policy states that new development will be supported where it supports the delivery of residential and visitor moorings in appropriate locations that do not adversely impact on the regeneration of the wider area or navigational function of the canal. It also identifies that residential uses with front doors on to the canal edge will be supported. This could lead to both positive and negative effects against this objective, as some existing residential moorings may be lost, where they are not considered to be in conformity with the regeneration proposals of the Local Plan. However, the overall net delivery of housing supply will be higher.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing	P3	+	S, M, L-T, D, IR, L	OPDC area	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the heat island effect					
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P3	+/-	S, M, L-T, D, R, M	Old Oak South and Old Oak North	Minimising the need to travel and focussing development around new public transport infrastructure such as walking and cycling, should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates	P3	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	of re-use, recycling and recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	P3	+/-	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account any impact on drainage functions. Furthermore, the Policy also states that any water entering the canal should be of adequate quality in line with the Water Framework Directive or any subsequent standards This could have some benefits against this objective. However, an increase in the use of the canal could increase the potential for negative effects on the water quality of this resource if not appropriately mitigated through policies in the Environment and Utilities Chapter.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P3	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The vision for the area states that the ecological role of the canal will be enhanced and used to support the delivery of the green infrastructure network. The policy wording seeks to ensure that the use of the Grand Union Canal for passenger and freight transport and leisure uses should take into account any impact on biodiversity. The delivery of towpath lighting should also consider the potential impact on biodiversity, as set out in the policy wording. This could have some benefits against this objective. Supporting text highlights that the canal is designated as a Site of Importance to Nature Conservation (SINC) that will be integral to the OPDC green infrastructure network. ~~*The Grand Union Canal is designated a SINC of Metropolitan grade, i.e. the highest, and this should be reflected in the supporting text.*~~
11	To minimise air, noise and light pollution, particularly for vulnerable	P3	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure such as walking and cycling as well as the creation of green infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	groups					
12	To conserve and enhance the historic environment, heritage assets and their settings	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy wording seeks that development proposals strengthen local identify and character by conserving and enhancing the Grand Union Canal Conservation Area and other associated heritage assets. It seeks to deliver a range of 6-8 storeys within Old Oak responding to its heritage significance. This could lead to significant benefits against this objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to provide a range of green and civic spaces, that could contribute to increasing a sense of community wellbeing locally, leading to positive effects against this objective.
14	Improve safety and reduce crime and the fear of crime	P3	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	~~The Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the towpath for walking, cycling and recreation. The vision sets out that development in this area will provide a safe and convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages~~. The policy states that bridge infrastructure and associated spaces should be designed to be integrated into the built environment and are accessible, safe and include active and positive frontages where possible. It also states that overlooking, security and safety along the canal and canalside spaces within Park Royal and Channel Gate should be delivered via positive frontages The policy also specifically sets out the need for towpath lighting, which could reduce the fear of crime along the canal, leading to positive effects.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P3	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The ~~Local Plan outlines that the current character of the Grand Union Canal is characterised by limited passive surveillance, which has a negative impact on the use of the towpath for walking, cycling and recreation. The vision sets out that development in this area will provide convenient walking and cycling route enabling people to access the length of Old Oak, Park Royal and beyond including through the use of active frontages~~policy seeks to deliver the Grand Union Canal Local Park, other smaller spaces, improvements to existing spaces and new basins and waterspaces. This could have benefits for physical and mental health through physical activity, increased community interaction and improved air quality in this area.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P3	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The vision and policy seeks to support ~~the economic functions of Old Oak and Park Royal,~~educational and commercial moorings which could lead to some positive benefits against this objective arising from its implementation.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy could increase the connectivity of the employment and residential areas across the plan area, as well as improving the local environment. This could be attractive to inward investors, leading to potential benefits against this objective.

P4: Park Royal West
P4C1: Brewery Cluster
Site Allocation ~~27~~5

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P4	++	S, M, L-T, I, R, L	Park Royal	The policy supports additional development which is appropriate to the industrial context across Park Royal as well as improvements to the transport network, including key routes, and enhanced greening and public realm. These policy objectives could lead to an improvement in the sense of place. In addition, heritage related design considerations could help to reinforce a sense of local distinctiveness.
		P4C1	+	S, M, L-T, I, R, L	Park Royal	The policy will ensure that new development is designed and located to support the activation of streets walking/ cycling routes and open space – all of which can play an important role in enhancing the built environment and encouraging place-making.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, L	Park Royal	The new residential and commercial floor~~p~~space proposed, as well as access to open space, will contribute to the area's sense of place.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P4	++	S, M, L-T, I, R, M	Park Royal	The policy supports intensification, responding to the need to make optimum use of land to create more jobs and support more businesses and also supports increased building heights. This should lead to the optimisation of land in this location.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy explores the idea of taller structures which will optimise the use of land through increased development densities.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	Park Royal	Policy P4 aims to optimise use of land therefore, it can be assumed that this would apply for this site allocation.
3	Maximise the reuse of previously developed land and existing buildings, including the	P4	++	S, M, L-T, I, R, M	Park Royal	The policy ~~protects existing employment floorspace so that it is available for reuse or redevelopment, which will have a positive effect against this objective. It also~~ supports intensification, responding to the need to optimise the reuse of this land to create more jobs and support more businesses.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy directs development to appropriate locations in this area, including previously developed land.
		~~Site A 27~~Site A	+	S, M, L-T, I, R, M	Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	remediation of contaminated land	5				
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The ~~protection of~~increased delivery of employment uses~~functions~~ would help minimise the need for local people to travel to find work. Park Royal West currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. Improvements to the movement network, particularly walking and cycling routes, to connect surrounding residential neighbourhoods and routes from stations into Park Royal could lead to significant benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports high quality walking and cycling routes which will improve accessibility and reduce the need to travel by car.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Policies P4 and P4C1 aim to minimise the need to travel and improve walking and cycling provision. The site allocation in this area will therefore have access to good sustainable transport links.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P4	+	S, M, L-T, D, R, M	Park Royal	The policy aims to facilitate the delivery of housing which could deliver some benefits against this objective.
		P4C1	+	S, M, L-T, D, R, M	Park Royal	The policy aims to facilitate the delivery of housing which could deliver some benefits against this objective.
		~~Site A 27~~Site A 5	+	S, M, L-T, D, R, M	Park Royal	The site allocation supports the delivery of housing. It is unclear what types of housing this would include at this stage but it is likely positive effects against this objective.
6	Improve climate	P4	+	S, M, L-T, D,	OPDC area	Impacts of the urban heat island effect and surface water can be minimised by greening

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect			IR, L	and surrounding boroughs	the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		P4C1	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	Possible impacts of the urban heat island effect and surface water flooding could be mitigated by the policies in the Environment and Utilities Chapter.
		~~Site A 27~~Site A 5	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The allocation site is located in a flood zone 1 area so has a low risk of flooding. New development will use energy and produce heat which may have a negative impact against this objective. Mitigation for this is covered in the Environment and Utilities Chapter.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P4	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the transport network to address congestion, as well as, the delivery of improvements to walking and cycling routes. These changes could lead to an improvement in local emissions levels. Development proposals could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.
		P4C1	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	Minimising the need to travel and focussing development around sustainable transport infrastructure should help to reduce the reliance on fossil fuels in the long term as discussed in policy P4 and cluster P4C1. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		~~Site A 27~~Site A 5	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P4	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme. The Environment and Utilities chapter include policies on waste management and waste minimisation which should mitigate against these. Also, the Twyford Waste Transfer station will be protected through this policy to ensure there is sufficient capacity across the West London Waste Plan area to manage waste.
		P4C1	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		~~Site A 27~~Site A 5	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the quality of the water environment	P4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		P4C1	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		~~Site A 27~~Site A 5	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P4	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports the introduction of more green infrastructure. This should enhance existing biodiversity and could lead to significant positive effects locally.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy aims to contribute towards or deliver improvements to green infrastructure assets. This should enhance existing biodiversity and could lead to significant positive effects locally.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	Park Royal	The allocation site is in close proximity to green open space so impacts to this area need to be mitigated. Improvements to this open space should enhance existing biodiversity and could lead to significant positive effects locally.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P4	+	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	The policy supports improvements to the road network to address congestion, as well as delivering improvements to walking and cycling routes. Therefore, the policy should lead to an improvement in air, noise and light pollution locally. The ~~protection~~ delivery of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. The policy aims to improve air quality monitoring and address any issues which arise from the monitoring results. This should also be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	Focussing improvements to routes to/from stations should help encourage more sustainable travel and reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated. Implementation of the Design, Environmental policies and London Plan guidance should ensure impacts are adequately mitigated.
		~~Site A 27~~Site A 5	+	S, M, L-T, D, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated. Implementation of the Design, Environmental policies and London Plan guidance should ensure impacts are adequately mitigated.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
12	To conserve and enhance the historic environment, heritage assets and their settings	P4	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy will help to protect proposed designated heritage assets and their setting. This could provide some benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	Park Royal	The policy aims to ensure proposal positively respond to heritage assets and help to reinforce a degree of local distinctiveness – both of which could provide some benefits against this objective.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	Park Royal	Policies P4 and P4C1 apply to this site allocation so implementation of all of these policies should deliver benefits against this objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P4	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy seeks to ~~protect~~ continue the function of the industrial land and support improvements to the movement network. Access to work opportunities resulting in people living and working in the same area could provide some benefits against this objective.
		P4C1	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage people to mix and promote community cohesion.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage community cohesion and positively contribute to this IIA objective.
14	Improve safety and reduce crime and the fear of crime	P4	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy supports improvements to the movement network to help improve safety and address congestion, as well as improving the public realm through the introduction of active and/or positive frontages. These could provide benefits in terms of reducing crime and the fear of crime.
		P4C1	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	The policy will ensure that new development is designed and located to support the activation of streets walking/ cycling routes and open space – all of which can play an important role in reducing crime and the fear of crime. Further benefits may also be realised through the supporting active frontages such as town centre uses, which could reduce the potential for anti-social behaviour.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	It can be assumed that policy P4 and P4C1will be applied to this site allocation.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P4	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The ~~protection of the industrial area~~delivery of additional industrial uses would help maintain jobs in the area, which would help contribute towards maximising wellbeing. The policy supports sustainable transport options which could also lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality. Accessibility to health services at Central Middlesex Hospital may also be improved through the increased connectivity. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		P4C1	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	The policy aims to promote access to existing open space, as well as walking and cycling routes. This approach could maximise health and wellbeing of the population by encouraging people to exercise outside for free and therefore deliver benefits against this IIA Objective.
		~~Site A 27~~Site A 5	+	S, M, L-T, D, R, M	Park Royal and surrounding areas	Policies P4 and P4C1 will ensure that this site allocation has good walking and cycling links and access to open space – both of which may encourage exercise.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding residential areas by sustainable modes of transport, walking and cycling.
		P4C1	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	New and improved walking and cycling routes can increase access to education services within and to the surrounding residential areas and score positively against this IIA objective.
		~~Site A 27~~Site A	+	S, M-T, I, R, M	OPDC area and	Deliver of housing set out in site allocations will support the delivery of educational

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		5			surrounding boroughs	facilities through planning contributions.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to support the economic functions of the strategic industrial location, which could lead to some positive benefits against this objective arising from the implementation of this policy.
		P4C1	+	S, M,L-T, I, R, M	Park Royal	The policy seeks to deliver new, high quality homes and space for jobs which will maximise the economic wellbeing of the local population and attract investment.
		~~Site A 27~~Site A 5	+	S, M,L-T, I, R, M	Park Royal	New homes and commercial floorspace will be available in this site allocation, thus scoring positively against this IIA objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P4	++	M, L-T, I, R, L	London-wide and nationally	The Park Royal industrial estate is protected by a SIL designation and appropriate development is supported in this location. This clarity of land uses, creation of new employment spaces, potential improvement in the local environment and connectivity could contribute to London's economic growth and improve the attractiveness of the area to inward investors.
		P4C1	+	S, M, L-T, I, R, L	Park Royal	The creation of new homes and employment spaces will contribute to London's economic growth, attract investors into the area and encourage inward investment.
		~~Site A 27~~Site A 5	+	S, M, L-T, I, R, L	Park Royal	The creation of new homes and employment spaces will contribute to London's economic growth, attract investors into the area and encourage inward investment.

P5 Old Park Royal

Site Allocations 6 and 7

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P5	+	S, M, L-T, I, R, L	Old Park Royal	The policy for Old Park Royal seeks to ~~respond positively to~~conserve and enhance its established historical character and as a vibrant hub for small businesses. This area will be supported as an attractive entrance into Park Royal from Old Oak. Creating new jobs and employment growth sectors, protecting the area's character, enhancing the public realm and supporting more opportunities to walk and cycle through this area should help to enhance the built environment and encourage place-making
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	By delivering areas for new jobs, the site allocations will support place-making.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P5	+	S, M, L-T, I, R, L	Old Park Royal	The policy supports intensification, responding to the need to make optimum use of land to create more jobs and support more businesses. This should lead to the optimisation of land in this location, including opportunities for horizontal/vertical extensions, sub division of units and redevelopment.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Policy P5 supports optimum use of land through intensification. This should lead to the optimisation of land for these sites, including opportunities for horizontal/vertical extensions.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
3	Maximise the reuse of previously developed land and existing buildings,	P5	+	S, M, L-T, I, R, L	Old Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	including the remediation of contaminated land					
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P5	++	S, M, L-T, D, R, L	Old Park Royal	The ~~protection~~ continued delivery of employment functions would help minimise the need for local people to travel to find work. Park Royal West currently suffers from high levels of road congestion generated by industrial functions and a reliance on private vehicular transport. Improvements to the movement network, particularly walking and cycling routes, to connect surrounding residential neighbourhoods and routes from stations into Park Royal could lead to significant benefits against this objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Policy P5 and two site allocations support continued delivery of employment functions help minimise the need for local people to travel to find work.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P5	0			There is no clear link between the policy and the IIA Objective.
		Site A 6	0			There is no clear link between the policy and the IIA Objective.
		Site A 7	0			
6	Improve climate	P5	+	S, M, L-T, D,	Old Park Royal	Impacts of the urban heat island effect and surface water can be minimised by greening

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect			R, L		the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	The allocation sites are located in ~~a~~ flood zone 1 area so has~~s~~ve a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective and are ~~is~~ not appropriately mitigated through guidance in the Environment and Utilities Chapter.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P5	+	S, M, L-T, D, R, L	Old Park Royal	The policy supports improvements to the transport network to address congestion, as well as, the delivery of improvements to walking and cycling routes. These changes could lead to an improvement in local emissions levels. Development proposals could help to improve energy efficiency through improving the performance of buildings. This may balance out a potential increase in demand for energy from new development, although the exact mix of uses and potential energy balance is unknown, leading to uncertainty in the prediction of effects.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Minimising the need to travel through providing further employment opportunities should help to reduce the use of private vehicles in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
8	To minimise production of waste across all	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					Economy.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
9	Improve the quality of the water environment	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	The new development from policy P4 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	These sites may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P5	+/-	S, M, L-T, D, R, L	Old Park Royal	There are no open spaces or designated biodiversity assets in Old Park~~Oak~~ Royal, so the policy supports new green infrastructure and the use of roof space for food growing. These policy measures should make a positive contribution towards this IIA objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
11	To minimise air,	P5	+	S, M, L-T, D,	Old Park Royal	Improvements to walking and cycling routes should lead to an improvement in air, noise

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	noise and light pollution, particularly for vulnerable groups			R, L		and light pollution locally. The protection of industrial uses may mean that pollution levels remain higher in the SIL compared with the surrounding areas. The policy aims to improve air quality monitoring and address any issues which arise from the monitoring results. This should also be monitored and regulated by the regulatory control system, which is outside the remit of the Local Plan.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new industrial development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
12	To conserve and enhance the historic environment, heritage assets and their settings	P5	+	S, M, L-T, D, R, L	Old Park Royal	This policy seeks to conserve and enhance Old Park Royal's historic industrial character and any individual buildings which positively contribute towards this. This will have a positive effect against the objective.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Site allocations are situated near heritage assets which provides an opportunity for development conserveation and enhancement of the historic environment.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy has a strong focus on public realm by enhanced street greening, public realm, and active or positive frontages, particularly along Bashley Road and Chandos Road which can act as an entrance into Park Royal area from Old Oak. Encouraging a better integration between Park Royal and Old Oak~~s,~~ and trying to attract people into the industrial area should help promote community cohesion.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	
14	Improve safety and reduce crime and the	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to maintain and increase the intensity of use in this area, introduce active and/or positive frontages and improve the public realm. These could provide benefits in terms of reducing crime and the fear of crime.
		Site A 6		S, M, L-T, ID,	Old Park Royal	It can be assumed that high quality design will be applied to the allocation sites as stated

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	fear of crime			R, L		in policy P5.
		Site A 7		S, M, L-T, ID, R, L	Old Park Royal	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P5	+/-	S, M, L-T, ID, R, L	Old Park Royal	The policy supports sustainable transport options which could also lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant.
		Site A 6	+/-	S, M, L-T, ID, R, L	Old Park Royal	Increasing opportunities for employment opportunities and sustainable transport options could lead to positive health effects in this location by encouraging people to walk and cycle and helping to improve local air quality. However, due to the low proportion of potential residents in this area and the retention of the area as an industrial location, effects are unlikely to be significant
		Site A 7	+/-	S, M, L-T, ID, R, L	Old Park Royal	
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P5	0			There is no clear link between the policy and the IIA Objective.
		Site A 6	0			There is no clear link between the policy and the IIA Objective.
		Site A 7	0			
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to protect and enhance existing economic and employment functions, including provision for small businesses. This approach would contribute towards achieving the IIA Objective by maintaining access to employment opportunities.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Site allocations seek to improve access to employment through industrial intensification therefore resulting in positive effects against this IIA Objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and training					
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P5	+	S, M, L-T, ID, R, L	Old Park Royal	The policy seeks to ~~protect existing and create~~continue the delivery of new employment work spaces. This will attract new businesses, contribute to London's economic growth, help to encourage inward investment Better integration with Old Oak via more attractive walking and cycling routes along Chandos and Bashley Road should help attract more footfall and investment into Park Royal.
		Site A 6	+	S, M, L-T, ID, R, L	Old Park Royal	Both site allocations offer opportunities for industrial intensification which would help attract investment into the area. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 7	+	S, M, L-T, ID, R, L	Old Park Royal	

P6P: Park Royal Centre

~~**P6C1: ASDA**~~

Site Allocations ~~26 and 28~~8 and 9

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P6	++	M, L-T, I, R, M	Park Royal and OPDC area	The policy for the area seeks to enhance the range of services, ~~shared services~~town centre uses and amenities in the area, to support local business, existing residential and medical communities. The public realm will be improved and benefit from new public open spaces alongside active street frontages. This is should lead to benefits against this objective.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, L	Park Royal	The new residential and commercial floorspace proposed, as well as access to open space, will contribute to the area's sense of place.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, L	Park Royal	The new residential floorspace proposed will contribute to the area's sense of place.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P6	++	M, L-T, I, R, L	Park Royal area	The policy seeks to increase the quantum of development and centralise the provision of services, ~~shared services and~~town centre uses and amenities to support surrounding businesses, residents and the medical community. This would create some benefits against this objective through creating more efficient use of land.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, M	Park Royal	Policy P6 aims to optimise use of land therefore, it can be assumed that this would apply for this site allocation.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, M	Park Royal	
3	Maximise the	P6	++	S, M, L-T, I, R, M	Park Royal Centre	The policy directs development to previously developed land. This reuse of land should generate benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	reuse of previously developed land and existing buildings, including the remediation of contaminated land					
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, M	Park Royal	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, M	Park Royal	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P6	++	S, M, L-T, I, R, M	Park Royal and OPDC area, and surrounding boroughs	The policy seeks to centralise services and amenities for the local business community, residents and the medical community. The policy also supports improvements to transport network and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to significant benefits against this objective.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	Policies P6 and P6C1 aim to minimise the need to travel and improve walking and cycling provision. The site allocation in this area will therefore have access to good sustainable transport links.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of	P6	~~+~~++	S, M-T, I, R, M	Park Royal and OPDC area	The policy aims to facilitate the delivery of housing and also commits to providing specialist housing along Acton Lane. Furthermore, the policy specifies that new specialist housing will continue to be supported and existing specialist housing protected in accordance with Policy H9 which could deliver benefits against this objective.
		~~Site A 26~~Site A 8	+	S, M, L-T, D, R, M	Park Royal	The site allocation supports the delivery of housing. It is unclear what types of housing this would include at this stage but it is likely positive effects against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	types and tenures, to meet identified local needs	~~Site A 28~~Site A 9	+	S, M, L-T, D, R, M	Park Royal	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P6	+	S, M, L-T, D, IR, L	Park Royal and OPDC area	Impacts of the urban heat island effect and surface water can be minimised by greening the area. Policies in the Environment and Utilities chapter will also ensure these impacts are adequately mitigated. This could lead to positive effects against this objective.
		~~Site A 26~~Site A 8	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The allocation site is located in a flood zone 1 area so has a low risk of flooding. New development will use energy and produce heat which may have a negative impact against this objective. Mitigation for this is covered in the Environment and Utilities Chapter.
		~~Site A 28~~Site A 9	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources	P6	+/-	S, M, L-T, D, R, M	Park Royal and OPDC area	The policy supports improvements to the transport network, the embedding of green infrastructure and the legibility of streets, including the delivery of cycling and walking infrastructure. This could lead to some benefits against this objective. Improvements to the highway network could lead to some positive effects on local emissions, although could also encourage the use of vehicular transport as a mode of travel unless improvements to the public transport, walking and cycling network are delivered in accordance with the Transport policies.
		~~Site A 26~~Site A 8	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	Minimising the need to travel and focussing development around sustainable transport infrastructure should help to reduce the reliance on fossil fuels in the long term as discussed in policy P6 and cluster P6C1. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	including fossil fuels for transport, heating and energy	~~Site A 28~~Site A 9	+/-	S, M, L-T, D, IR, M	Park Royal and surrounding boroughs	energy supply aren't secured.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P6	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through the Waste Management and Waste Minimisation policies.
		~~Site A 26~~Site A 8	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		~~Site A 28~~Site A 9	+/-	S, M-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P6	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure, embedding green infrastructure such as green walls/roofs, alongside the potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants.
		~~Site A 26~~Site A 8	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The new development from policy P6 may lead to some negative effects from pollution run off. However, urban greening (green roofs/walls etc) and the implementation of policies within the Environment and Utilities Chapter, could provide an opportunity for the positive management of water quality.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~Site A 28~~Site A 9	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P6	+	S, M, L-T, D, R, M	OPDC area	The policy aims to embed green infrastructure throughout the area, this would include green walls and roofs in line with policies in the Environment chapter. This approach could help achieve benefits against this objective.
		~~Site A 26~~Site A 8	+/-	S, M, L-T, D, R, M	Park Royal	New development can lead to a loss of biodiversity. Mitigation for this is included in the policies in the Environment chapter.
		~~Site A 28~~Site A 9	+/-	S, M, L-T, D, R, M	Park Royal	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P6	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated against.
		~~Site A 26~~Site A 8	+/-	S, M, L-T, D, R, M	OPDC area	New development can lead to increase levels of noise, light and air pollution. However, this can be mitigated through Policy P6 by encouraging increasing use of sustainable transport and the implementation of policies in the Environment chapter.
		~~Site A 28~~Site A 9	+/-	S, M, L-T, D, R, M	OPDC area	
12	To conserve and enhance the historic	P6	+	S, M, L-T, D, IR, M	OPDC area	Park Royal Centre's historic character is more limited than neighbouring places and its lacks a sense of place or clear identity. The policy should help to enhance the local built environment, which could lead to some benefits for the setting of any historic assets.
		~~Site A~~	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	environment, heritage assets and their settings	~~26~~Site A 8				
		~~Site A 28~~Site A 9	0			
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to the potential severance caused by the road network locally. The policy seeks to concentrate the provision of services, shared services and amenities into the town centre in order to support local businesses, residents and the medical community. This approach, alongside providing greater publicly accessible open space and accessibility by walking and cycling modes the creation of more active frontages, which could help attract additional footfall and encourage different people to meet/mix in the area. These improvements could create significant benefits against this objective above the existing baseline.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential and commercial floorspace as well as use of shared open space could encourage community cohesion and positively contribute to this IIA objective.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	New residential floorspace could encourage community cohesion and positively contribute to this IIA objective.
14	Improve safety and reduce crime and the fear of crime	P6	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Improvements to this key road junction could deliver significant benefits to road safety. Measures to improve the built environment within this area, including the creation of more active frontages and a mix of buildings which are used through the day/night, would maximise passive surveillance and therefore create significant benefits against this objective above the existing baseline.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	It can be assumed that policy P6 and P6C1will be applied to this site allocation.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, M	Park Royal and surrounding areas	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P6	++~~+~~	S, M, L-T, I, R, M	Park Royal and surrounding areas	Improvements in the local transport infrastructure to encourage more sustainable modes could help to support health and wellbeing. Also p~~P~~olicy supports the enhancement of health care facilities and any associated functions at Central Middlesex Hospital, therefore increasing and improving access to health care for local residents~~, Middlesex hospital is still going to be retain~~, furthering the benefits against this objective.
		~~Site A 26~~Site A 8	0			There is no clear link between the policy and the IIA Objective.
		~~Site A 28~~Site A 9	0			
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P6	0			There is no clear link between the policy and the IIA Objective.
		~~Site A 26~~Site A 8	0			There is no clear link between the policy and the IIA Objective.
		~~Site A 28~~Site A 9	0			
17	Maximise the social and economic wellbeing of the local and regional	P6	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The p~~P~~olicy seeks to create new employment space whilst supporting the economic functions of the industrial location of Park Royal. Both of these would support jobs growth and therefore could lead to some positive benefits against this objective.
		~~Site A 26~~Site A 8	+	S, M,L-T, I, R, M	Park Royal	New homes and commercial floorspace will be available in this site allocation, thus scoring positively against this IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	population and improve access to employment and training	~~Site A 28~~Site A 9	+	S, M,L-T, I, R, M	Park Royal	New homes will be available in this site allocation, providing opportunities for construction related employment and training, thus scoring positively against this IIA objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P6	++	M, L-T, I, R, L	London-wide and nationally	The policy supports a range of employment uses and supporting services and amenities within a centralised, accessible area. This should help to generate significant benefits against this objective.
		~~Site A 26~~Site A 8	+	S, M, L-T, I, R, L	Park Royal	The creation of new homes and employment spaces will contribute to London's economic growth, attract investors into the area and encourage inward investment.
		~~Site A 28~~Site A 9	+	S, M, L-T, I, R, L	Park Royal	The creation of new homes will contribute to London's economic growth, attract investors into the area and encourage inward investment.

P7 North Action and Acton Wells
P7C1 North Action ~~Station~~Town Centre Cluster
P7C2 Old Oak Common Lane Station Cluster
Site Allocations ~~11 to 21~~10 to 20

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P7	++	S, M, L-T, I, R, M	North Acton and OPDC area	The policy seeks to improve the public realm within the area, including supporting the development of active frontages. Alongside the delivery of a new public ~~civic square~~open spaces, residential, employment, community infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P7C1	+	S, M, L-T, I, R, M	North Acton	The vision aims to provide a high-density neighbourhood centre focused on an enhanced North Acton Station and to produce high quality public realm which leads to a positive against this objective.
		P7C2	+	S, M, L-T, I, R, M	Old Oak Common area	The vision aims to ~~enhance~~ deliver the proposed Old Oak Common Lane station and aims to support and enhance public realm, thus scoring positively against this objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.
		Site A 11~~Site A 12~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 12~~Site A 13~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 13~~Site A 14~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 14~~Site A~~	+	S, M, L-T, I, R, M	North Acton and Acton	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~15~~			Wells and OPDC area	
		Site A 15~~Site A 16~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 16~~Site A 17~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 17~~Site A 18~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 18~~Site A 19~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 19~~Site A 20~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 20~~Site A 21~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
2	To optimise the efficient use of land through increased	P7	++	S, M, L-T, I, R, M	North Acton	The policy specifies the areas ~~where~~ that high densities will be encouraged across the area. This could lead to significant benefits against this Objective.
		P7C1	++	S, M, L-T, I, R, M	North Acton	The vision specifies a high density town centre~~s~~ will be delivered which will benefit this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	development densities and building heights, where appropriate	P7C2	0			There is no clear link between the policy and the IIA Objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, I, R, M	North Acton	Policy P7 aims to encourage high density buildings. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged.
		Site A 11~~Site A 12~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 12~~Site A 13~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 13~~Site A 14~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 14~~Site A 15~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 15~~Site A 16~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 16~~Site A 17~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 17~~Site A 18~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 18~~Site A 19~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 19~~Site A 20~~	+	S, M, L-T, I, R, M	North Acton	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 20~~Site A 21~~	+	S, M, L-T, I, R, M	North Acton	
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P7	++	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P7C1	++	S, M, L-T, I, R, M	North Acton	The vision specifies the areas ~~where~~ that high densities will be encouraged across the area. All development in the OPDC area is on previously developed land, so will score positively against this objective. This could lead to benefits against this o~~O~~bjective.
		P7C2	+	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 11~~Site A 12~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 12~~Site A 13~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 13~~Site A 14~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 14~~Site A 15~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 15~~Site A 16~~	+	S, M, L-T, I, R, M	North Acton	
		Site A	+	S, M, L-T, I,	North Acton	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		16~~Site A 17~~		R, M		
		Site A 17~~Site A 18~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 18~~Site A 19~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 19~~Site A 20~~	+	S, M, L-T, I, R, M	North Acton	
		Site A 20~~Site A 21~~	+	S, M, L-T, I, R, M	North Acton	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P7	++	M, L-T, I, R, L	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections centred on main ~~routes, and~~routes, and will ensure that North Action is integrated into the wider regeneration area. The policy supports higher density development across the area. Highways improvements and active frontages along streets are proposed, alongside new and/or improved connections across the A40 to West Acton. The policy also proposes new walking and cycling routes and significant employment as well as residential, thereby bringing homes and jobs closer together. These measures could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. It is also unclear what type of 'connections' across the A40 are supported by the policy.
		P7C1	++	M, L-T, I, R, L	North Acton and OPDC area, and surrounding boroughs	The vision supports enhancements to North Acton station. The policy aims to improve Victoria Road and deliver new and improved walking and cycle pathways. This will support walking and cycling, thus minimising the need to travel by private vehicle thus scoring positively against this objective.
		P7C2	++	M, L-T, I, R, L	Old Oak	The vision supports to enhance Old Oak Common station~~. The policy~~ and aims to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Common and OPDC area, and surrounding boroughs	~~develop Victoria Road and~~ improve walking and cycle pathways and bus traffic. This will minimise the need to travel by private vehicle thus scoring positively against this objective.
		Site A 11	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	Policies P7, P7C1 and P7C2 aim to minimise the need to travel and provide new stations. The site allocations in this area will therefore be situated near good sustainable transport, walking, and cycling links.
		Site A 10~~Site A 12~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 11~~Site A 13~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 12~~Site A 14~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 13~~Site A 15~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 14~~Site A 16~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 15~~Site A 17~~	+	M, L-T, I, R, L	OPDC area, and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 16~~Site A 18~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 17~~Site A 19~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 18~~Site A 20~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
		Site A 19~~Site A 21~~	+	M, L-T, I, R, L	OPDC area, and surrounding boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P7	++	S, M, L-T, D, R, L	North Acton, OPDC area and surrounding boroughs	As stated in the Local Plan, the area is currently being ~~regenerated~~ developed with existing developments of residential and student housing being included within the land uses. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		P7C1	0			There is no clear link between the policy and the IIA Objective.
		P7C2	0			There is no clear link between the policy and the IIA Objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		Site A 11~~Site A 12~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 12~~Site A 13~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 13~~Site A 14~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 14~~Site A 15~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 15~~Site A 16~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 16~~Site A 17~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 17~~Site A 18~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 18~~Site A 19~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
		Site A 19~~Site A 20~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 20~~Site A 21~~	+	S, M, L-T, I, R, M	North Acton and Acton Wells and OPDC area	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P7	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		P7C1	0			The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		P7C2	0			The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 10~~Site A 11~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 11~~Site A 12~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 12~~Site A 13~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 13~~Site A 14~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 14~~Site A~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~15~~			Wells and OPDC area	
		Site A 15~~Site A 16~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 16~~Site A 17~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 17~~Site A 18~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 18~~Site A 19~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 19~~Site A 20~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
		Site A 20~~Site A 21~~	+/-	S, M, L-T, D, IR, L	North Acton and Acton Wells and OPDC area	
7	To minimise contributions to climate change through greater energy	P7	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured. Policy supporting text does however set out that any proposals will be expected to deliver on site low carbon

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy					heating solutions which could result in benefits against this objective.
		P7C1	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to North Acton Station, and will ensure that North Acton is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective, although an increase in employment creating greater energy needs could lead to a negative impact on the IIA objective. The increase of sustainable transport will have positive effects against this objective however, potential use of private vehicles could put more pressure on resources.
		P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Common Lane Station~~,~~ and will ensure that Old Oak Common is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective, although an increase in employment creating greater energy needs could lead to a negative impact on the IIA objective. The increase of sustainable transport will have positive effects against this objective.
		Site A 10~~Site A 11~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 11~~Site A 12~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 12~~Site A 13~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 13~~Site A 14~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 14~~Site A 15~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 15~~Site A 16~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 16~~Site A 17~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 17~~Site A 18~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 18~~Site A~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~19~~			area, and surrounding boroughs	
		Site A 19~~Site A 20~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
		Site A 20~~Site A 21~~	+/-	S, M, L-T, D, R, M	North Acton and OPDC area, and surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P7	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P7C1	+/-	S, M, L-T, D, R, M	North Acton Area	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common Area	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 10~~Site A 11~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 11~~Site A 12~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	SP2 regarding innovation, including supporting the Circular Economy.
		Site A 12~~Site A 13~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 13~~Site A 14~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 14~~Site A 15~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 15~~Site A 16~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 16~~Site A 17~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 17~~Site A 18~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 18~~Site A 19~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 19~~Site A 20~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 20~~Site A 21~~	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P7	0~~+/-~~	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area. ~~Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.~~
		P7C1	0~~+/-~~	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area. ~~Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.~~
		P7C2	0~~+/-~~	S, M-T, D, IR, M	OPDC area and surrounding boroughs	There is no direct link between the policy and the IIA objective given the lack of water bodies in the area. ~~Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.~~

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 10~~Site A 11~~	0			There is no direct link between the policy and the IIA objective given the lack of water bodies in the area.
		Site A 11~~Site A 12~~	0			
		Site A 12~~Site A 13~~	0			
		Site A 13~~Site A 14~~	0			
		Site A 14~~Site A 15~~	0			
		Site A 15~~Site A 16~~	0			
		Site A 16~~Site A 17~~	0			
		Site A 17~~Site A 18~~	0			
		Site A 18~~Site A 19~~	0			
		Site A 19~~Site A 20~~	0			

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 20~~Site A 21~~	0			
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P7	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P7C1	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		P7C2	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		Site A 10~~Site A 11~~	+/-	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 11~~Site A 12~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 12~~Site A 13~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 13~~Site A 14~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 14~~Site A 15~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 15~~Site A 16~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A	+/-	S, M-T, D, IR,	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		16~~Site A 17~~		M		
		Site A 17~~Site A 18~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 18~~Site A 19~~	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 19~~Site A 20~~	+/-			
		Site A 20~~Site A 21~~	+/-			
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P7	+/-	S, M, L-T, D, R, M	OPDC area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P7C1	+/-	S, M, L-T, D, R, M	North Acton area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P7C2	+/-	S, M, L-T, D, R, M	Old Oak Common area	The policy requires development to contribute to improving air quality along the A40 and Victoria Road. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 10~~Site A 11~~	0	S, M, L-T, D, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 11~~Site A 12~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 12~~Site A 13~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 13~~Site A 14~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 14~~Site A 15~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 15~~Site A 16~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 16~~Site A 17~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 17~~Site A 18~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A 18~~Site A 19~~	0	S, M, L-T, D, R, L	OPDC area	
		Site A	0	S, M, L-T, D,	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		19~~Site A 20~~		R, L		
		Site A 20~~Site A 21~~	0	S, M, L-T, D, R, L	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P7	+~~+~~	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy aims to conserve and enhance the proposed locally listed Castle Public House and other heritage assets and their settings and strengthen local identity by responding to existing and proposed locally listed buildings alongside the wider historic environment. This could provide some benefits against this objective.
		P7C1	0			There is no clear link between the policy and the IIA Objective.
		P7C2	+	S, M, L-T, D, IR, M	Old Oak Common area	There is no clear link between the policy and the IIA Objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	Supporting text in policy P7 and policy D6 aims to conserve and enhance existing heritage sites. This will mitigate against any impacts heritage assets located in close proximity to the site allocation developments.
		Site A 11~~Site A 12~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 12~~Site A 13~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 13~~Site A 14~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 14~~Site A 15~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 15~~Site A 16~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 16~~Site A 17~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 17~~Site A 18~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 18~~Site A 19~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 19~~Site A 20~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
		Site A 20~~Site A 21~~	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	
13	Increase community cohesion and reduce social exclusion to encourage a	P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a mixed use high density neighbourhood that includes residential, student housing, employment uses and town centre uses. The supporting text identifies the need to accord with policy H10 to ensure student housing contributes to sustainable communities. It also seeks to deliver a range of employment uses and town centre uses to support new and existing communities. The policy also seeks to improve connections between features within the area such as the station and the town centre uses, which should enable the achievement of significant benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	sense of community and welfare	P7C1	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public.
		P7C2	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduced social exclusion as areas will be more accessible by the public.
		Site A 10~~Site A 11~~	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
		Site A 11~~Site A 12~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 12~~Site A 13~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 13~~Site A 14~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 14~~Site A 15~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 15~~Site A 16~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 16~~Site A 17~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 17~~Site A 18~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 18~~Site A 19~~	+	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 19~~Site A 20~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 20~~Site A 21~~	+	S, M, L-T, D, R, M	OPDC area	
14	Improve safety and reduce crime and the fear of crime	P7	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network across the area with a focus on walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance.
		P7C1	+	S, M, L-T, D, R, M	North Acton and Acton Wells	The policy seeks that North Acton Station provides new high quality 24 hour walking and cycling access to improve permeability of the area. This should achieve benefits against this objective.
		P7C2	+	S, M, L-T, D, R, M	North Acton and Acton Wells	The policy seeks that North Acton Station provides new high quality 24 hour walking and cycling access to improve permeability of the area. This should achieve benefits against this objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The requirement to deliver a legible and permeable street network could contribute positively to the IIA objective for these site allocations.
		Site A 11~~Site A 12~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 12~~Site A 13~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 13~~Site A 14~~	+	S, M, L-T, D, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 14~~Site A 15~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 15~~Site A 16~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 16~~Site A 17~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 17~~Site A 18~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 18~~Site A 19~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 19~~Site A 20~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 20~~Site A 21~~	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	
15	Maximise the health and	P7	+	S, M, L-T, I, R, M	North Acton and surrounding	Land uses supported will include a mix of scale retail, leisure and community uses and eating and drinking establishments to serve local needs. The policy also specifically requires that supported development will be of a lower density in more sensitive locations

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	wellbeing of the population, reduce inequalities in health and promote healthy living				areas	close to residential areas, as well as areas of open space such as Acton Cemetery, as well as improve connections between features within the area such as the station and the town centre uses. This~~, which~~ should enable the achievement of benefits against this objective in terms of community cohesion and interaction, as well as physical activity, leading to a greater sense of wellbeing locally and an increase in natural surveillance. The policy also seeks to enhance air quality working with TfL and relevant boroughs. Walking and cycling is also encouraged through new and improved connections. Potential improvements in air, noise and light quality could further improve physical health.
		P7C1	+	S, M, L-T, I, R, M	North Acton and surrounding areas	The policy aims to promote walking and cycling via new routes which will help to promote healthy living and score positively against this objective.
		P7C2	+	S, M, L-T, I, R, M	Old Oak common and surrounding areas	The policy aims to promote walking and cycling via new routes which will help to promote healthy living and score positively against this objective.
		Site A 10~~Site A 11~~	?			It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as health and sports facilities, contained within it, but it's uncertain at this level of detail how likely this will be.
		Site A 11~~Site A 12~~	?			
		Site A 12~~Site A 13~~	?			
		Site A 13~~Site A 14~~	?			
		Site A 14~~Site A 15~~	?			

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 15~~Site A 16~~	?			
		Site A 16~~Site A 17~~	?			
		Site A 17~~Site A 18~~	?			
		Site A 18~~Site A 19~~	?			
		Site A 19~~Site A 20~~	?			
		Site A 20~~Site A 21~~	?			
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P7	++	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. The policy specifically supports the delivery of education uses close to North Acton station, which could lead to significant benefits against this objective.
		P7C1	+	S, M-T, I, R, M	North Acton	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to a positive against the objective.
		P7C2	+	S, M-T, I, R, M	Old Oak Common	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This could lead to a positive against the objective.
		Site A 10~~Site A 11~~	+	S, M-T, I, R, M	OPDC area and surrounding	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling through Policy P7. This will result in the site allocations scoring positively against

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	this IIA objective.
		Site A 11~~Site A 12~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 12~~Site A 13~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 13~~Site A 14~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 14~~Site A 15~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 15~~Site A 16~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 16~~Site A 17~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 17~~Site A 18~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 18~~Site A 19~~	+	S, M-T, I, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 19~~Site A 20~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 20~~Site A 21~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P7	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses ~~around the station squares~~. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		P7C1	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses around the station squares. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		P7C2	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The Policy seeks to support the economic functions of Old Oak and Park Royal, by delivering a range of employment uses around the station squares. Accessibility to training facilities may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. As such these could lead to some positive benefits against this IIA objective.
		Site A 10~~Site A 11~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocations that contribute to housing will deliver have some associated social infrastructure contained within it, but it's uncertain at this level of detail how likely this will be.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 11~~Site A 12~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 12~~Site A 13~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 13~~Site A 14~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 14~~Site A 15~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 15~~Site A 16~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 16~~Site A 17~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 17~~Site A 18~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 18~~Site A 19~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 19~~Site A 20~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 20~~Site A 21~~	+	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P7	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of workspaces~~, including flexible workspaces~~ that can support small businesses, and a significant quantum of new jobs and SME space, focussed on the station and major routes. This should help to deliver significant benefits against this objective.
		P7C1	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		P7C2	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		Site A 10~~Site A 11~~	+	M, L-T, I, R, L	London-wide and nationally	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 11~~Site A 12~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 12~~Site A 13~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 13~~Site A 14~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 14~~Site A~~	+	M, L-T, I, R, L	London-wide and nationally	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~15~~				
		Site A 15~~Site A 16~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 16~~Site A 17~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 17~~Site A 18~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 18~~Site A 19~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 19~~Site A 20~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 20~~Site A 21~~	+	M, L-T, I, R, L	London-wide and nationally	

P8 Old Oak Lane and Old Oak Common Lane
P8C1 Atlas Junction Town Centre
Site Allocations ~~22~~ 21 to 25

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P8	++	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	The policy seeks to improve the public realm within the area, including supporting the development of active frontages while supporting the functioning and improvement of the SIL. Alongside the delivery of a new town centre, public spaces, residential uses, a mix of employment uses, community infrastructure and improved connections across the area, the policy could lead to the generation of significant positive benefits against this objective.
		P8C1	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	The supporting text aims to deliver a new town centre that is supported by high quality public realm and conserves and enhances local character. Alongside these elements and by creating new housing and communities, this can have a positive impact on place-making.
		Site A 21	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	By delivering new homes and space for new jobs, site allocations will support place-making.
		Site A 22	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
		Site A 23	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
		Site A 24	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					and OPDC area.	
		Site A 25	+	S, M-T, I, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area.	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P8	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	The policy sets out the locations for a mixed use ~~development~~ neighbourhood within the Westway Estate and adjacent sites~~across the place~~ and defines that a range of buildings heights will be considered here as appropriate.
		P8C1	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	The policy aims to deliver a range of buildings heights, with potential for increased heights that relate to the existing Collective development helping to increase development capacity, thus score positively against this objective.
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	Building heights are considered in Policy P7. It can be assumed that these site allocations will incorporate tall buildings where appropriate.
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
3	Maximise the reuse of	P8	++	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	All development in the OPDC area is on previously developed land, so will score positively against this objective. The policy aims to retain existing residential areas and buildings which will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	previously developed land and existing buildings, including the remediation of contaminated land	P8C1	++	S, M, L-T, I, R, M	Old Oak Lane and Old Oak Common Lane	The policies provide guidance for a range of buildings heights. All development in the OPDC area is on previously developed land, so will score positively against this objective. This could lead to benefits against this Objective.
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts	P8	++	S, M, L-T, D, R, M	OPDC area	The policy aims to improve existing and deliver new walking and cycling routes and routes for buses which will minimise the need to travel by motorised transportation methods.
		P8C1	++	S, M, L-T, D, R, M	OPDC area	The policy aims to improve existing and deliver new walking and cycling routes and routes for buses which will minimise the need to travel by motorised transportation methods.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	The site allocations are in areas near good cycling and walking routes. This will minimise the need to travel by motorised transportation methods.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	on the transport network	Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P8	++	S,M, L-T, D, R, M	OPDC area	The policy supports mixed housing types and mixed use neighbourhoods. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		P8C1	++	S,M, L-T, D, R, M	OPDC area	The policy supports mixed housing types and mixed use neighbourhoods. The vision for the area seeks to build upon this, to provide a substantial number of new homes in the area, which could lead to benefits against this objective.
		Site A 21	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		Site A 22	+	S, M-T, D, R, M	OPDC area	
		Site A 23	+	S, M-T, D, R, M	OPDC area	
		Site A 24	+	S, M-T, D, R, M	OPDC area	
		Site A 25	+	S, M-T, D, R, M	OPDC area	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing	P8	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		P8C1	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	The allocation site is located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the heat island effect	Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	this objective. Mitigation for this is provided within policy SP2 and within the Environment and Utilities Chapter.
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane	
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P8C1	+/-	S, M, L-T, D, R, M	Atlas Junction and OPDC area, and surrounding boroughs	The vision for the area supports new and improved connections to Old Oak Lane and Old Oak Common Lane~~,~~ and will ensure that Atlas junction is integrated into the wider regeneration area. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. Increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					Common Lane and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Oak Common Lane and OPDC area, and	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P8C1	+/-	S, M, L-T, D, R, M	Atlas Junction and OPDC area, and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 21	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 22	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 23	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area, and surrounding boroughs	
		Site A 24	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
9	Improve the quality of the water environment	P8	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	Policy includes for canalside green infrastructure, ~~I~~improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport all of which could help to reduce the runoff of pollutants locally.
		P8C1	+/-	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	~~I~~Policy includes for canalside green infrastructure, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport all of which could help to reduce the runoff of pollutants locally.
		Site A 21	0			There is no clear link between the allocation and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 22	0			There is no clear link between the allocation and the IIA Objective.
		Site A 23	0			There is no clear link between the allocation and the IIA Objective.
		Site A 24	0			There is no clear link between the allocation and the IIA Objective.
		Site A 25	0			There is no clear link between the allocation and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		P8C1	+/-	S, M, L-T, D, R, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
		Site A 21	+/-	S, M-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 22	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 23	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 24	+/-	S, M-T, D, IR, M	OPDC area	
		Site A 25	+/-	S, M-T, D, IR, M	OPDC area	
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P8	+/-	S, M, L-T, D, R, M	OPDC area	The policy requires development to contribute to improving air quality by mitigating against impacts from local pollution sources particularly identifying Old Oak Sidings waste facility and SIL uses within Willesden Junction Bus Garage. Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P8C1	0			There is no clear link between the policy and the IIA Objective.
		Site A 21	+/-	S, M, L-T, D, R, M	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by design, environmental policies and London Plan guidance.
		Site A 22	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+/-	S, M, L-T, D, R, L	OPDC area	
		Site A 24	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+/-	S, M, L-T, D, R, L	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P8	+	S, M, L-T, D, R, M	OPDC area	This policy aims to maintain and enhance existing and proposed heritage assets and local character. This will have a positive effect against the IIA objective.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	This policy aims to maintain and enhance existing and proposed heritage assets. This will have a positive effect against the IIA objective.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	Policy P8 and cluster P8C1 aim to maintain and enhance any existing heritage sites. Any negative impacts on listed buildings from development will be mitigated against.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
13	Increase community cohesion and reduce social exclusion to	P8	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public as will the delivery of a range of housing and open space and associated employment space.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduce social exclusion as areas will be more accessible by the public as will the delivery of a range of housing and open space, including canal side activation, and associated employment space.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	encourage a sense of community and welfare	Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed by providing new housing developments and open space (site 26), this will positively contribute to the IIA objective.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
14	Improve safety and reduce crime and the fear of crime	P8	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network across the area with a focus on walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of improving safety and reducing fear of crime.
		P8C1	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network within the cluster, including the Grand Union Canal towpath which currently suffers from a lack of natural surveillance. This could enable the achievement of benefits against this objective in terms of improving safety and reducing fear of crime. T
		Site A 21	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	The requirement to deliver a high quality movement network could contribute positively to the IIA objective for these site allocations
		Site A 22	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area, and surrounding boroughs	
		Site A 23	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 24	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
		Site A 25	+	S, M, L-T, D, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	
15	Maximise the health and wellbeing of the population, reduce inequalities in	P8	++	S, M, L-T, D, R, M	OPDC area	The policy aims to support health and well-being by, ensuring development mitigates the impacts of noise and air pollution generated by Old Oak Sidings waste facility, SIL uses on the Willesden Junction Bus Garage~~Harlesden Bus Depot~~ site and construction activities including associated vehicle movement~~, contributing to redirecting construction and freight traffic from Channel Gate Road to Goodhall Street~~ to mitigate impacts on residential amenity and contributing to and/or delivering measures that help support OPDC, the boroughs and where relevant TfL, to address air quality issues along Victoria

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	health and promote healthy living					Road and Old Oak Lane including street greening. This will have a major positive against the objective.
		P8C1	+	S, M, L-T, I, R, M	Old Oak Lane and Old Common Lane and OPDC area, and surrounding boroughs	The policy aims to promote walking and cycling via new routes and mitigating impacts of air pollution sources which will help to promote healthy living and score positively against this objective.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that site allocation that contributes housing will have some associated social infrastructure, such as health and sports facilities, contained within it. Policy P8 aims to address issues from air quality in the area. This will have a positive effect against the IIA objective.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P8	+	S, M, L-T, D, R, M	OPDC area	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	Policy P8 states that site allocations will include provisions for education facilities, thus scoring positively against the IIA objective.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P8	+	S, M, L-T, D, R, M	OPDC area	The policy states that employment uses and mix use will be supported, including for small business. This could lead to local employment increasing.
		P8C1	+	S, M, L-T, D, R, M	OPDC area	The policy states that employment uses and mix use will be supported, including for small business. This could lead to local employment increasing.
		Site A 21	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that site allocation that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.
		Site A 22	+	S, M, L-T, D, R, M	OPDC area	
		Site A 23	+	S, M, L-T, D, R, M	OPDC area	
		Site A 24	+	S, M, L-T, D, R, M	OPDC area	
		Site A 25	+	S, M, L-T, D, R, M	OPDC area	
18	To encourage inward investment alongside investment within existing communities, to create	P8	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		P8C1	+	M, L-T, D, R, L	OPDC area	The policy seeks to improve access and create employment uses which will encourage inward investment within OPDC.
		Site A 21	+	M, L-T, D, R, L	OPDC area	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 22	+	M, L-T, D, R, L	OPDC area	
		Site A 23	+	M, L-T, D, R, L	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	sustainable economic growth	Site A 24	+	M, L-T, D, R, L	OPDC area	
		Site A 25	+	M, L-T, D, R, L	OPDC area	

P9 Channel Gate
Site allocation 26

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P9 / Site A 26	++	S, M, L-T, D, R, M	Channel Gate and OPDC area	The vision seeks to deliver a high density industrial area showcasing industrial innovation that optimises use of adjacent transport infrastructure. The policy also defines the aspiration to deliver a high quality movement network alongside expanding existing open spaces as well as creating active frontages along the Grand Union Canal and Victoria Road. This will contribute to place-making positively.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC area	The policy aims to deliver high density industrial areas which will have a positive effect against this objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P9 / Site A 26	++	S, M, L-T, I, R, M	North Acton	All development in the OPDC area is on previously developed land, so will score positively against this objective.
4	Minimise the need to travel, improve accessibility for all users by public	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC	The policy aims to deliver new and improve walking and cycle links and new connections across barriers which will have a positive effect against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and non-motorised transportation methods and mitigate impacts on the transport network					
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P9 / Site A 26	0			There is no clear link between the policy and the IIA Objective as the area is located within a Strategic Industrial Location designation.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P9 / Site A 26	0			No reference is made within the policy to adapt to the potential effects of climate change as this is provided in policy SP2 and within the Environment and Utilities Chapter.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P9 / Site A 26	+/-	S, M, L-T, D, R, M	Channel Gate and OPDC area, and surrounding boroughs	The vision for the area is to create a high industrial area showcasing industrial innovation. ~~This is called Channel Gate and is a high quality development that optimises use of adjacent transport infrastructure.~~ It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. This could lead to some benefits against this objective, although an increase in employment could lead to an increased number of travellers which could lead to a negative impact on the IIA objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P9 / Site A 26	+/-	M, L-T, D, R, M	Channel Gate and surrounding areas	The increase in new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
9	Improve the	P9 / Site A	0~~+/-~~	~~M, L-T, D, R, M~~	~~Channel Gate and~~	There is no clear link between the policy and the IIA Objective as the ~~P~~policy makes no reference to the improvement of the water environment. ~~Improvements in the local road~~

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	quality of the water environment	26			~~surrounding areas~~	~~infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants locally.~~
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P9 / Site A 26	+/-	S, M-T, D, IR, M	OPDC area	The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P9 / Site A 26	+	S, M, D, R, M	Channel Gate	The policy aims to mitigate against any impacts it makes on air, noise and light pollution. Examples of mitigation techniques include the use of robust materials, noise absorbing materials and use of planting to mitigate air and noise pollution.
12	To conserve and enhance the historic environment, heritage assets and their settings	P9 / Site A 26	+	S, M, L-T, D, R, M	Channel Gate and OPDC area	The policy aims to strengthen local identity and character by conserving and enhancing Grand Union Canal Conservation Area~~, Plantagenet House~~ and the adjacent Old Oak Lane Conservation Area as well the wider industrial heritage. This will have a positive effect against the IIA objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	The policy aims to create new jobs and green spaces which can encourage a sense of community.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	community and welfare					
14	Improve safety and reduce crime and the fear of crime	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	The supporting text in the policy seeks to increase natural surveillance along the canal, thus scoring positively against this objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	By expecting proposals to contribute towards increasing the community garden space (Old Oak Common Community Gardens) in the policy, this can potentially promote wider healthy living aims.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P9 / Site A 26	0			There is no clear link between the policy and the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and	P9 / Site A 26	+	S, M, L-T, D, R, L	Channel Gate and OPDC area	By encouraging good transport links and by creating new employment and investment opportunities, this will maximise the social and economic wellbeing of the local and regional population and could improve access to employment and training.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	improve access to employment and training					
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P9 / Site A 26	++	S, M, L-T, D, R, L	Channel Gate and OPDC area	By encouraging good transport links and by creating new employment and investment opportunities, this will encourage inward investment alongside investment within existing communities, to create sustainable economic growth.

P10 Scrubs Lane
P10C1 Harrow Road Cluster
P10C2 Laundry ~~Lane~~ Cluster
P10C3 Hythe Road Cluster
P10C4 Mitre Canal Cluster
Site Allocations ~~1 to 7 (NB Site Allocation 1 also falls within Willesden Junction place)~~27 to 34

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P10	++	M, L-T, I, R, M	Scrubs Lane and OPDC area	The policy seeks to contribute to and/or deliver new and improved walking and cycling routes, access to Wormwood Scrubs and Little Wormwood Scrubs as well as a high quality coordinated public realm, street greening and the clustering of active land uses. Alongside the overall approach to the area, which focusses development around the important historic character of the area, these measures should lead to an improvement in local distinctiveness locally.
		P10C1	+	S, M, L-T, D, R, H	Harrow Road and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C2	+	S, M, L-T, D, R, H	~~Laundry Lane~~Park Road (part of) and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C3	+	S, M, L-T, D, R, H	Hythe Road and OPDC area	The policy includes improving existing and delivering new public realm, new open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		P10C4	+	S, M, L-T, D, R, H	Mitre Canalside and OPDC area	The policy includes improving existing and delivering new public realm, new and improve open spaces, creating high quality connections with surrounding areas and providing a range of active uses. This will have a positive effect on this IIA objective.
		Site A 27	+	S, M-T, I, R, M	OPDC area	By delivering new homes and space for new jobs, site allocations will support place-making.
		~~Site A 1~~Site A 28	+	S, M-T, I, R, M	OPDC area	
		~~Site A 2~~Site A	+	S, M-T, I, R, M~~S, M, L-T,~~	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		29		~~D, R, H~~		
		~~Site A 3~~Site A 30	+	S, M, L-T, D, R, H~~S, M-T, I, R, M~~	OPDC area	
		~~Site A 4~~Site A 31	+	S, M, L-T, D, R, H~~S, M-T, I, R, M~~	OPDC area	
		~~Site A 5~~Site A 32	+	S, M-T, I, R, M~~S, M, L-T, D, R, H~~	OPDC area	
		~~Site A 6~~Site A 33	+	S, M-T, I, R, M	OPDC area	
		~~Site A 7~~Site A 34	+	S, M-T, I, R, M	OPDC area	
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P10	++	S, M, L-T, I, R, M	Scrubs Lane	The policy specifies the areas where ~~high densities~~greater heights will be encouraged across the area, seeking to recognise sensitive historic assets as locations where lower ~~densities~~ heights would be appropriate. This could lead to benefits against this Objective.
		P10C1	+	S, M, L-T, D, R, H	~~Harrow Road~~ and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. This will score positively against this objective.
		P10C2	+	S, M, L-T, D, R, H	~~Laundry Lane~~Park Road (part of) and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. This will score positively against this objective.
		P10C3	+	S, M, L-T, D, R, H	Hythe Road and OPDC area	The supporting text aims to supply a variety of different building heights where appropriate including a single taller building. This will score positively against this objective.
		P10C4	+	S, M, L-T, D,	Mitre Canalside	The supporting text aims to supply a variety of different building heights where

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, H	and OPDC area	appropriate including a single taller building. This will score positively against this objective.
		Site A 27	+	S, M-T, I, R, M	OPDC area	Policy P10 aims to encourage a range of building ~~densities~~heights. Therefore, it can be assumed that high density buildings for these site allocations will be encouraged that also respond to sensitive locations.
		Site A 28~~Site A 1~~	+	S, M-T, I, R, M	OPDC area	
		Site A 29~~Site A 2~~	+	S, M-T, I, R, M	OPDC area	
		Site A 30~~Site A 3~~	+	S, M-T, I, R, M	OPDC area	
		Site A 31~~Site A 4~~	+	S, M-T, I, R, M	OPDC area	
		Site A 32~~Site A 5~~	+	S, M-T, I, R, M	OPDC area	
		Site A 33~~Site A 6~~	+	S, M-T, I, R, M	OPDC area	
		Site A 34~~Site A 7~~	+	S, M-T, I, R, M	OPDC area	
3	Maximise the reuse of previously developed land and existing	P10	++	S, M, L-T, I, R, M	Scrubs Lane	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C1	+	S, M, L-T, D, R, H	Harrow Road and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	buildings, including the remediation of contaminated land	P10C2	+	S, M, L-T, D, R, H	Park Road (part of) and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C3	+	S, M, L-T, D, R, H	Hythe Road and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		P10C4	+	S, M, L-T, D, R, H	Mitre Canalside and OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 27	+	S, M, L-T, D, R, H	OPDC area	All development in the OPDC area is on previously developed land, so will score positively against this objective.
		Site A 28~~Site A 1~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 29~~Site A 2~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 30~~Site A 3~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 31~~Site A 4~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 32~~Site A 5~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 33~~Site A 6~~	+	S, M, L-T, D, R, H	OPDC area	
		Site A 34~~Site A~~	+	S, M, L-T, D, R, H	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~7~~				
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P10	++	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	The policy seeks to contribute towards and/or deliver new and improved walking and cycling routes to the east and west and improved infrastructure along Scrubs Lane. It also uses building heights to support local legibility to destinations and stations. These measures could lead to benefits against this objective.
		P10C1	+	S, M, L-T, D, R, L	Harrow Road and OPDC area	This policy aims to contribute to delivering new, high quality east-west walking and cycling connections connecting Scrubs Lane with Old Oak ~~High~~ Street.
		P10C2	+	S, M, L-T, D, R, L	~~Laundry Lane~~Park Road (part of) and OPDC area	This policy aims to contribute to delivering new, high quality east-west walking and cycling and vehicular connections connecting Scrubs Lane with Old Oak ~~Gardens~~South.
		P10C3	+	S, M, L-T, D, R, L	Hythe Road and OPDC area	This policy aims to contribute to delivering new and improved, high quality east-west walking, cycling and vehicular connections connecting Scrubs Lane with Hythe Road Station and a retained Rolls Royce Building.
		P10C4	+	S, M, L-T, D, R, L	Mitre Canalside and OPDC area	This policy aims to contribute to delivering new and improved, high quality east-west walking and cycling connections connecting Scrubs Lane with Old Oak North and South on both sides of the Grand Union Canal.
		Site A 27	+	S, M, L-T, D, R, L	OPDC area	The site allocations are ~~situated in an accessible area. They are~~ located near good walking, cycling and sustainable transport links which will minimise the need to travel. The policy and clusters for the area seek to improve the connector routes and install new footpaths and cycle lanes to improve this further.
		Site A 28~~Site A 1~~	+	S, M, L-T, D, R, L	OPDC area	
		Site A 29~~Site A 2~~	+	S, M, L-T, D, R, L	OPDC area	
		Site A 30~~Site A 3~~	+	S, M, L-T, D, R, L	OPDC area	
		Site A	+	S, M, L-T, D,	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		31~~Site A 4~~		R, L		
		Site A 32~~Site A 5~~	+	S, M, L-T, D, R, L	OPDC area	
		Site A 33~~Site A 6~~	+	S, M, L-T, D, R, L	OPDC area	
		Site A 34~~Site A 7~~	+	S, M, L-T, D, R, L	OPDC area	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P10	++	S, M, L-T, D, R, M	OPDC area	This policy supports the delivery of a range of mixed-use development along Scrubs Lane including new homes. It also aims to improve access via roads, walking and cycling.
		P10C1	+	S, M, L-T, D, R, M	Harrow Road and OPDC area	The policy seeks to deliver housing across the cluster and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.
		P10C2	+	S, M, L-T, D, R, M	~~Laundry Lane~~Park Road (part of) and OPDC area	The policy seeks to deliver housing across the cluster and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.
		P10C3	+	S, M, L-T, D, R, M	Hythe Road and OPDC area	The policy seeks to deliver a mixed use cluster including for housing ~~across the cluster~~ and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.
		P10C4	+	S, M, L-T, D, R, M	Mitre Canalside and OPDC area	The policy seeks to deliver housing across the cluster, including residential moorings, and guides locations away from areas of potentially poor residential amenity. This will have a positive impact against the objective.
		Site A 27	+	S, M-T, D, R, M	OPDC area	The site allocations are situated in an accessible area and will be required to accord with affordable housing policies within the Housing Chapter.
		Site A 28~~Site A 1~~	+	S, M-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 29~~Site A 2~~	+	S, M-T, D, R, M	OPDC area	
		Site A 30~~Site A 3~~	+	S, M-T, D, R, M	OPDC area	
		Site A 31~~Site A 4~~	+	S, M-T, D, R, M	OPDC area	
		Site A 32~~Site A 5~~	+	S, M-T, D, R, M	OPDC area	
		Site A 33~~Site A 6~~	+	S, M-T, D, R, M	OPDC area	
		Site A 34~~Site A 7~~	+	S, M-T, D, R, M	OPDC area	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P10	+	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	~~By minimising the impact on the sewer network and reducing the risk of flooding by~~Policy supporting text ensures that the design of proposals should include for ~~implementing~~ sustainable drainage systems ~~connected to the Grand Union Canal, and new water infrastructure this~~and associated green infrastructure helping to reduce the risk of flooding ~~will~~resulting in a positive score ~~positively~~ against this objective.
		P10C1	+	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
		P10C2	+	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
		P10C3	+	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P10C4	+	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The green infrastructure policies seek to embed resilience to climate change. This will score positively against this objective.
		Site A 27	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	The sites are located in a flood zone 1 area so has a low risk of flooding. The developments will use energy and produce heat which have a negative impact against this objective. Mitigation for this is provided within Policy SP2 and within the Environment and Utilities Chapter.
		Site A 28~~Site A 1~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 29~~Site A 2~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 30~~Site A 3~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 31~~Site A 4~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 32~~Site A 5~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 33~~Site A 6~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
		Site A 34~~Site A 7~~	+/-	S,M, L-T, D, R, M	Scrubs Lane and OPDC area	
7	To minimise contributions to climate change through greater	P10	+/-	M, L-T, I, R, L	Scrubs Lane and OPDC area, and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy					
		P10C1	+/-	M, L-T, I, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		P10C2	+/-	M, L-T, I, R, L	OPDC area	
		P10C3	+/-	M, L-T, I, R, L	OPDC area	
		P10C4	+/-	M, L-T, I, R, L	OPDC area	
		Site A 27	+/-	M, L-T, I, R, L	OPDC area	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the reliance on fossil fuels in the long term. However, the increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.
		Site A 28~~Site A 1~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 29~~Site A 2~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 30~~Site A 3~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 31~~Site A 4~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 32~~Site A 5~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 33~~Site A 6~~	+/-	M, L-T, I, R, L	OPDC area	
		Site A 34~~Site A 7~~	+/-	M, L-T, I, R, L	OPDC area	
8	To minimise	P10	+/-	M, L-T, D, R,	OPDC area	The intensification of new development could significantly increase the pressure on

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste			M	and surrounding boroughs	natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C1	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C2	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		P10C3	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy. The removal of the waste management facilities may also impact on the local management waste if not mitigated through other policies in the Local Plan.
		P10C4	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 27	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	Insufficient information given to assess but it can be presumed that the increase in new development will increase the pressure on natural resources and generation of waste during operation as well as through the construction programme if not adequately mitigated and managed through policies in the Environment and Utilities Chapter and SP2 regarding innovation, including supporting the Circular Economy.
		Site A 28~~Site A 1~~	+/-	M, L-T, D, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 29~~Site A 2~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 30~~Site A 3~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 31~~Site A 4~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 32~~Site A 5~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 33~~Site A 6~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
		Site A 34~~Site A 7~~	+/-	M, L-T, D, R, M	OPDC area and surrounding boroughs	
9	Improve the quality of the water environment	P10	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	Improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6, through the potential management of increase in polluted surface water runoff entering the water environment. However, the extent of predicted benefits is uncertain. Street 'greening' could also create benefits to a certain degree, although it is unclear what exactly these measures might comprise.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P10C1	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	New developments can lead to pollutant run off entering the water environment. However, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6.
		P10C2	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		P10C3	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		P10C4	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 27	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	New developments can lead to pollutant run off entering the water environment. However, improvements in the local road infrastructure and potential increase in the use of more sustainable modes of transport could help to reduce the runoff of pollutants. Flood risk management could also create benefits against this objective, as assessed under objective 6.
		Site A 28~~Site A 1~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 29~~Site A 2~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 30~~Site A 3~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 31~~Site A 4~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 32~~Site A 5~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 33~~Site A 6~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
		Site A 34~~Site A 7~~	+/-	S, M-T, D, IR, L	OPDC area and surrounding boroughs	
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P10	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C1	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C2	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		P10C3	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P10C4	0			The policy also does not make a specific reference to biodiversity as guidance is provided in policy EU2. New open spaces could support biodiversity, however new development could also lead to a loss of biodiversity if not appropriately mitigated by policy EU2.
		Site A 27	+/-	M, L-T, D, IR, M	OPDC area	Through the implementation of policies within the Environment and Utilities Chapter, these sites will be required to deliver a range of open spaces and deliver a net additional increase in biodiversity.
		Site A 28~~Site A 1~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 29~~Site A 2~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 30~~Site A 3~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 31~~Site A 4~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 32~~Site A 5~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 33~~Site A 6~~	+/-	M, L-T, D, IR, M	OPDC area	
		Site A 34~~Site A 7~~	+/-	M, L-T, D, IR, M	OPDC area	
11	To minimise air, noise and light	P10	+/-	S, M, L-T, D, R, M	OPDC area	This policy aims to mitigate against any noise pollution created from railways. Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	pollution, particularly for vulnerable groups					locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P10C1	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P10C2	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P10C3	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		P10C4	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 27	+/-	S, M, L-T, D, R, M	OPDC area	Improvements in the movement network and potential increase in the use of more sustainable modes of transport could also help to reduce air, noise and light pollution locally. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated
		Site A 28~~Site A~~	+/-	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		~~1~~				by policies within the Design, Environment and Utilities Chapters and London Plan guidance.
		Site A 29~~Site A 2~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 30~~Site A 3~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 31~~Site A 4~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 32~~Site A 5~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 33~~Site A 6~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 34~~Site A 7~~	+/-	S, M, L-T, D, R, M	OPDC area	
12	To conserve and enhance the historic environment, heritage assets and their settings	P10	++	M, L-T, D, IR, M	OPDC area and surrounding boroughs	The policy seeks to strengthen local identity and character by conserving and enhancing existing and proposed heritage assets within the area and adjacent to it. It also seeks to reflect wider heritage in future development, thus scoring significant positively against this IIA objective.
		P10C1	+	S, M, L-T, D, R, M	OPDC area	The policy identifies the local historic railways to be an important heritage theme that can help shape the character of development ~~seeks to enhance local character by conserving and enhancing proposed heritage assets within the area, thus~~ scoring positively against this IIA objective.
		P10C2	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to enhance local character by conserving and enhancing proposed heritage assets within the area, thus scoring positively against this IIA objective.
		P10C3	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to enhance local character by conserving and enhancing local heritage within the area, thus scoring positively against this IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		P10C4	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to enhance local character by conserving and enhancing existing proposed heritage assets within the area, thus scoring positively against this IIA objective.
		Site A 27	+/-	S, M, L-T, D, R, M	OPDC area	Site allocations are situated near listed buildings which could be negatively impacted ~~against~~ during construction. However, Policy P10 aims to conserve and enhance existing listed heritage sites and aims to ensure that future development acknowledges this heritage. ~~which not only mitigates against any negative impacts, but also further improves the heritage.~~
		Site A 28~~Site A 1~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 29~~Site A 2~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 30~~Site A 3~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 31~~Site A 4~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 32~~Site A 5~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 33~~Site A 6~~	+/-	S, M, L-T, D, R, M	OPDC area	
		Site A 34~~Site A 7~~	+/-	S, M, L-T, D, R, M	OPDC area	
13	Increase community cohesion and reduce social exclusion to	P10	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	encourage a sense of community and welfare	P10C1	+	S, M, L-T, D, R, M	OPDC area	The policy is 'a community and employment focused cluster framed by the prominent corner of Harrow Road and Scrubs Lane and a new Old Oak ~~High~~ Street connecting to Willesden Junction.' This will help to increase community cohesion and reduce social exclusion.
		P10C2	+	S, M, L-T, D, R, M	OPDC area	The policy aims to support a ~~housing and community focused~~mixed-use cluster which will have a positive impact against the IIA objective.
		P10C3	+	S, M, L-T, D, R, M	OPDC area	By improving sustainable transport links, this can help reduced social exclusion as areas will be more accessible by the public.
		P10C4	+	S, M, L-T, D, R, M	OPDC area	The policy aims to support a housing and community focused cluster which will have a positive impact against the IIA objective.
		Site A 27	+	S, M, L-T, D, R, M	OPDC area	It can be assumed that by delivering new homes and space for new jobs that these site allocations will positively contribute to this IIA objective.
		Site A 28~~Site A 1~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 29~~Site A 2~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 30~~Site A 3~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 31~~Site A 4~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 32~~Site A 5~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 33~~Site A 6~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A	+	S, M, L-T, D,	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		34~~Site A 7~~		R, M		
14	Improve safety and reduce crime and the fear of crime	P10	++	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver a high quality movement network across the area with a focus on walking and cycling routes supported by active and positive frontages. These connections seek to connect local designations. This could enable the achievement of benefits against this objective in terms of community cohesion and interaction, leading to a greater sense of wellbeing locally and an increase in natural surveillance.
		P10C1	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
		P10C2	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
		P10C3	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new and improved east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
		P10C4	+	S, M, L-T, D, R, M	OPDC area	The policy seeks to provide new and improved east-west high quality walking and cycling routes to improve permeability of the area. This should achieve benefits against this objective.
		Site A 27	+	S, M, L-T, D, R, M	OPDC area	The requirement to deliver a legible and permeable street network could contribute positively to the IIA objective for these site allocations
		Site A 28~~Site A 1~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 29~~Site A 2~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 30~~Site A 3~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 31~~Site A 4~~	+	S, M, L-T, D, R, M	OPDC area	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 32~~Site A 5~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 33~~Site A 6~~	+	S, M, L-T, D, R, M	OPDC area	
		Site A 34~~Site A 7~~	+	S, M, L-T, D, R, M	OPDC area	
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P10	+	M, L-T, I, R, M	Scrubs Lane and surrounding areas	The policy supports development of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, access to recreational space at Wormwood Scrubs, as well as reducing traffic congestion, could increase community interaction. This would result in greater cohesion as well as physical activity and improved physical health over time. It would also result from potential long term air quality improvements. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community, leading to improvements in mental health.
		P10C1	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C2	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C3	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		P10C4	+	S, M, L-T, I, R, M	OPDC area	The policy aims to support and enhance health and wellbeing through green infrastructure and will have a positive impact against the IIA objective.
		Site A 27	?			It can be assumed that site allocation will contribute some associated social infrastructure, such as health and sports facilities, contained within it, but it's uncertain at this level of detail how likely this will be. Policy P10 aims to improve access which means access to health care facilities will be more readily available.
		Site A 28~~Site A 1~~	?			
		Site A	?			

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		29~~Site A 2~~				
		Site A 30~~Site A 3~~	?			
		Site A 31~~Site A 4~~	?			
		Site A 32~~Site A 5~~	?			
		Site A 33~~Site A 6~~	?			
		Site A 34~~Site A 7~~	?			
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P10	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C1	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C2	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C3	+	S, M-T, I, R, M	OPDC area and surrounding	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		P10C4	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		Site A 27	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling. This will result in the site allocations scoring positively against this IIA objective.
		Site A 28~~Site A 1~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 29~~Site A 2~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 30~~Site A 3~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 31~~Site A 4~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 32~~Site A 5~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 33~~Site A 6~~	+	S, M-T, I, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 34~~Site A 7~~	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P10	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to deliver social infrastructure that could include training facilities. Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
		P10C1	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The ~~P~~policy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C2	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The p~~P~~olicy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C3	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The p~~P~~olicy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		P10C4	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The p~~P~~olicy seeks to deliver employment space for SMEs that help support place-making, deliver a mixed-use place and act as a catalyst for wider regeneration, as well as new town centre uses. This could lead to positive effects against this Objective.
		Site A 27	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	It can be assumed that site allocation that contributes housing will have some associated social infrastructure contained within it. The site allocations are located near employment opportunities and sustainable transport links. This will make jobs in other locations in London more accessible.
		Site A 28~~Site A 1~~	+	S, M,L-T, I, R, M	OPDC area and surrounding	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					boroughs	
		Site A 29~~Site A 2~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 30~~Site A 3~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 31~~Site A 4~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 32~~Site A 5~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 33~~Site A 6~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
		Site A 34~~Site A 7~~	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	
18	To encourage inward investment alongside investment within existing	P10	++	M, L-T, I, R, L	London-wide and nationally	The policy seeks to provide a range of flexible workspaces as part of the development of the Cumberland Park Factory and new mixed use developments. This should help to deliver significant benefits against this objective.
		P10C1	+	M, L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	communities, to create sustainable economic growth	P10C2	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C3	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		P10C4	+	M,L-T, I, R, M	OPDC area and surrounding boroughs	The creation of new employment areas and better transport facilities will encourage inward investment within existing communities and create sustainable economic growth.
		Site A 27	+	M, L-T, I, R, L	London-wide and nationally	Providing new, high quality homes in the OPDC area can attract investment. The whole OPDC area itself is all about regeneration, transport and jobs and will score positively against this objective.
		Site A 28~~Site A 1~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 29~~Site A 2~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 30~~Site A 3~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 31~~Site A 4~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 32~~Site A 5~~	+	M, L-T, I, R, L	London-wide and nationally	
		Site A 33~~Site A 6~~	+	M, L-T, I, R, L	London-wide and nationally	

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		Site A 34~~Site A 7~~	+	M, L-T, I, R, L	London-wide and nationally	

P11 Willesden Junction

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P11	++	S,M,L-T, D, R, M	OPDC area	Policy provides an enhanced station at Willesden Junction along with associated leisure facilities and green spaces. Policy also includes the delivery of new town centre uses focused around Willesden Junction station which would help to positively integrate the areas surroundings ~~By creating new green spaces, transport hubs and leisure facilities for members of the public, this can~~ playing an important role in place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P11	+	S, M, L-T, D, R, M	OPDC area	The policy aims to produce high density development which will have a positive effect against this objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P11	+	S, M, L-T, D, R, M	OPDC area	By focusing on high density development, this will contribute to maximising the reuse of previously developed land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	P11	+	S, M, L-T, D, R, M	OPDC area	By creating new transport hubs and interchanges, this will encourage sustainable transport and discourage use of private motorised vehicles.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P11	++	S,M, L-T, D, R, M	OPDC area	This policy supports the delivery of a range of mixed-use development for Willesden Junction by contributing to the delivery of new homes and during the plan. It also aims to improve access through sustainable transport.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	P11	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P11	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The vision for the area supports new and improved transport connections. It also encourages walking and cycling and proposes employment and jobs in the same area thereby reducing the possible distances travelled. Highways improvements and active frontages along streets are proposed. This could lead to some benefits against this objective, although a focus on highways improvements could reduce potential significance. increase in new development could significantly increase the pressure on natural resources from energy requirements during operation as well as through the construction programme if renewable sources of energy supply aren't secured.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	P11	+/- ~~0~~	M, L-T, D, R, M	OPDC area and surrounding boroughs	The intensification of new development could significantly increase the pressure on natural resources and generation of waste during operation as well as through the construction programme. This will be mitigated and managed through the Waste Policy.
9	Improve the quality of the water environment	P11	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P11	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P11	+/-	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	Minimising the need to travel and focussing development around new public transport infrastructure should help to reduce the pollution levels in the long term. However, the increase in new development could significantly increase noise, air and light pollution, particularly during the construction period if not adequately mitigated by design, environmental policies and London Plan guidance.
12	To conserve and enhance the historic environment, heritage assets and their settings	P11	+	S, M, L-T, D, R, M	OPDC area and surrounding boroughs	The policy aims to conserve and enhance existing heritage assets thus scoring positively against the IIA objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P11	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy supports development as part of a mix of uses, which could help to create a sense of community locally. The proposed improvements to walking and cycling links, as well as reducing traffic congestion, could increase community interaction, resulting in greater cohesion. Improvements to the public realm based on the enhancement of historic assets could lead to a greater sense of place, which could have further benefits for the local sense of community.
14	Improve safety and reduce crime and the fear of crime	P11	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P11	+	S, M, L-T, D, R, L	OPDC area	~~The provision of green infrastructure~~Although the Policy does not specifically reference health and wellbeing, the inclusion of green infrastructure through the application of Policy D6 would result ~~can~~ in a positive score ~~positively~~ against this IIA objective ~~as it encourages people to go outside and interact~~.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	P11	+	S, M-T, I, R, M	OPDC area and surrounding boroughs	Accessibility to education services may be improved through the increased connectivity within and to the surrounding areas by sustainable modes of transport, walking and cycling.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P11	0			There is no clear link between the policy and the IIA Objective.
18	To encourage	P11	+	S, M-T, I, R,	OPDC area	By improving transport links and employment opportunities it can encourage inward

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	inward investment alongside investment within existing communities, to create sustainable economic growth			M	and surrounding boroughs	investment within the area as well as be ensuring that Willesden Junction becomes a destination in its own right

P12 Wormwood Scrubs

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	P12	++	S, M, L-T, I, R, M	OPDC area	Wormwood Scrubs is described in the Local Plan as a cherished public open space that provides people and wildlife with the opportunity to enjoy nature and space for recreation and relaxation. The policy seeks to conserve and enhance the Scrubs as a public open space, alongside securing resources for its management in agreement with stakeholders, which should help to conserve and enhance its function.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	P12	+	S, M, L-T, I, R, M	Wormwood Scrubs	The continued protection of Wormwood Scrubs is considered to be an efficient use of space appropriate to its relevant designations.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	P12	0			The policy will not lead to the development of previously developed land reflecting the protection of Wormwood Scrubs as Metropolitan Open Land and that offered by relevant legislation.
4	Minimise the need to travel, improve	P12	++	S, M, L-T, D, R, M	OPDC area, and surrounding	The policy seeks to improve access to Wormwood Scrubs from surroundings areas. This could help to improve accessibility and help to connect communities within the area through improved public realm and connectivity (walking and cycling).

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network				boroughs	
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	P12	0			The policy will not lead to the delivery of housing development.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing	P12	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy specifies that development should seek to overcome current surface water flooding issues. This could lead to positive effects against this objective. However, how this might be achieved is not specified, leading to low certainty in the prediction of effects.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	the heat island effect					
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	P12	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to be sensitively enhanced to enable the area to adapt to climate change, although this is not specified within the policy. It is referred to in the justification text and in the Water Policy. The promotion of walking and cycling access to the park may reduce current emissions from people accessing the park, leading to some positive benefits against this objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates	P12	0			The policy is unlikely to have an effect when considered against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	of re-use, recycling and recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	P12	+	S, M-T, D, IR, L	OPDC area and surrounding boroughs	The policy discusses surface water flooding and how the OPDC area could be used as a more strategic flood management resource. This will have a positive effect against the objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	P12	++	S, M, L-T, I, R, M	OPDC area and surrounding boroughs	The policy seeks to conserve and enhance the existing Local Nature Reserve and sites of borough importance for nature conservation in accordance with policy EU2, which could lead to positive effects against this objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	P12	+	S, M, L-T, I, R, L	OPDC area, and surrounding boroughs	The management of Wormwood Scrubs has the potential to address air and noise pollution, although this is not specified within the policy. The promotion of walking and cycling access to the park may reduce current pollution levels from people accessing the park, leading to some positive benefits against this objective.
12	To conserve and enhance the historic environment,	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	heritage assets and their settings					
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	P12	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The conservation~~ing~~ and enhancement~~ing~~ of Wormwood S~~c~~crubs as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to support this effect.
14	Improve safety and reduce crime and the fear of crime	P12	+	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The enhancing of Wormwood Scrubs could help to improve safety through appropriate lighting and improving access to open space to create higher levels of natural surveillance.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	P12	++	S, M, L-T, D, IR, M	OPDC area and surrounding boroughs	The management of the facilities as a public open space for exercise and recreation could have significant positive effects against this objective. Increasing accessibility to the area through walking and cycling connections is likely to support this effect.
16	To improve the education and skills levels of all	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	members of the population, particularly vulnerable groups					
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	P12	0			The policy is unlikely to have an effect when considered against this IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	P12	+	S, M,L-T, I, R, M	OPDC area and surrounding boroughs	The conserving and enhancing of this green open space could encourage inward investment to some degree, through increasing the attractiveness of the area as a place to live and work.

Table D-3 Design

D1: Securing high quality design
D2: Public Realm
D3: Accessible and Inclusive design
D4: Well-designed buildings
D5: Tall buildings
D6: Amenity
D7: Key views
D8: Heritage
D9: Play Space

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	D1	++	M, L-T, D, R, H	OPDC area	The policy seeks to deliver a high quality design process to create high quality development resulting in an enhanced built environment. As the policy provides opportunities to develop and enhance and the built environment, and explores the process to deliver a high quality built environment. Major positive scores have been recorded against the IIA Objective.
		D2	++	M, L-T, D, R, H	OPDC area	The policy seeks to deliver well designed, welcoming, safe, resilient, flexible, inclusive, and coordinated multifunctional public realm network through supporting proposals that contribute to improving the quality of existing public realm and creating new public realm; this would contribute to improving local character areas or contributing to the delivery of new local character areas which would encourage place-making.
		D3	+	S, M, L-T, I, R, M	OPDC area	The provision of an inclusive designed environment for Old Oak, Park Royal, and Wormwood Scrubs would support place-making as it ensures new buildings are appropriately designed and optimises development opportunities to develop and enhance local distinctiveness and character.
		D4	++	M, L-T, D, R, M	OPDC area	The policy seeks to deliver well designed buildings which would encourage place-making. Policy also includes strict compliance with Building Regulations into relation to resilience and fire safety and aims to achieve BREEAM Excellent ratings for non-residential development
		D5	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver high quality tall buildings which would contribute towards place-making.
		D6	+	S, M, L-T, I, R, M	OPDC area	The provision of a high level of amenity and quality environment for building users and surrounding areas would help to support place-making.
		D7	+	S, M, L-T, I,	OPDC area	By ensuring areas benefit from and are shaped key views, this can positively contribute to

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		place-making as it creates visual interest that contributes to character and the built environment.
		D8	++	S, M, L-T, I, R, M	OPDC area	The conservation and enhancement of the historic environment, heritage assets and their setting would contribute towards creating a sense of place through protecting and enhancing local distinctiveness and character.
		D9	+	S, M, L-T, I, R, M	OPDC area	By having open spaces for young children to play, this will positively contribute to wider place-making.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	D1	0			There is no clear link between the policy and the IIA Objective.
		D2	0			There is no clear link between the policy and the IIA Objective.
		D3	0			There is no clear link between the policy and the IIA Objective.
		D4	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver well designed buildings that -will- contribute to optimising development. It will have an indirect positive effect against the IIA objective by facilitating high quality design.
		D5	+	S, M, L-T, I, R, M	OPDC area	Due to their form and scale, tall buildings generally enable the delivery of higher densities. The supporting text discusses increasing development capacity of tall buildings which can have a positive impact against this IIA Objective.
		D6	0			There is no clear link between the Policy and IIA Objective.
		D7	0			There is no clear link between the Policy and IIA Objective.
		D8	0			There is no clear link between the Policy and IIA Objective.
		D9	0			There is no clear link between the Policy and IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated	D1	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D2	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D3	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D4	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D5	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D6	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	land					objective.
		D7	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D8	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
		D9	0			All of OPDC land is previously developed land, therefore there is a neutral impact on this objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	D1	+	S, M, L-T, I, R, M	OPDC area	The delivery of high quality design quality should involve good levels of accessibility which would support the IIA Objective.
		D2	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to contribute to or improve the network of streets and to contribute to connecting places together which would support the improvement of accessibility and may contribute towards minimising the need to travel.
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The policy specifically seeks to deliver accessible design solutions that meet the requirements of all users and contribute to addressing barriers which currently exist.
		D4	0			The policy would enable the provision of sustainable new buildings however this would have a limited effect in achieving the IIA Objective.
		D5	0			There is no clear link between the policy and the IIA Objective.
		D6	0			There is no clear link between the policy and the IIA Objective.
		D7	0			There is no clear link between the policy and the IIA Objective.
		D8	0			There is no clear link between the policy and the IIA Objective.
		D9	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet	D1	+	S, M, L-T, I, R, M	OPDC area	By delivering a high quality design process for development, improved access to housing will be more likely.
		D2	0			The policy seeks the delivery of public realm and therefore has no direct link to the IIA Objective.
		D3	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks to deliver inclusive design which will help to improve access and include a range of types and tenures of housing for all ages in order to meet local needs.
		D4	+			The policy addresses the delivery of all new buildings including housing.
		D5	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks to ensure that tall buildings accord with housing policies too which may benefit this IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	identified local needs	D8	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	D1	0			There is no clear link between the policy and the IIA Objective.
		D2	+	S, M, L-T, D, I, R, L	OPDC area	This policy seeks to utilise sustainable materials that will support this IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D, I, R, L	OPDC area	It is stated that new development proposals will be supported if renewable energy generation is incorporated into the design. This could help to improve climate change adaption. This policy also seeks to utilise sustainable materials that will support this IIA Objective.
		D5	+	S, M, L-T, D, I, R, L	OPDC area	This policy states that it will not adversely affect amenity in terms of microclimates, air quality etc, so this may have a positive effect on the IIA Objective
		D6	+	S, M, L-T, D, I, R, L	OPDC area	The policy aims to minimise the heat island effect, which will score positively against this IIA objective. The provision of amenity space has the potential to act as flood storage which could prevent adverse risk to housing areas.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no direct link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D, I, R, M	OPDC area	The policy seeks the development of well-designed buildings which would likely support the minimisation of contributions to climate change through high standards of sustainable design and the incorporation of incorporated measures for energy efficiency. By supporting new development proposals which incorporate renewable energy generation could reduce the need to use fossil fuels and score positively against this IIA objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	+	S, M, L-T, D, I, R, M	OPDC area	The supporting text considers heating and energy efficiency which will help to contribute to minimising contributions to climate change.
		D7	0			There is no direct link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	including fossil fuels for transport, heating and energy	D8	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no direct link between the policy and the IIA Objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+/-	S, M, L-T, D, I, R, M	OPDC area	Development of new buildings could have negative effects resulting in increased waste particularly during construction if waste management and circular economy policies are not implemented. The policy also seeks to utilise sustainable materials that will support this IIA Objective.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no direct link between the policy and the IIA Objective.
9	Improve the quality of the water environment	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks to deliver green infrastructure and sustainable materials. This could include water efficiency and cleaning measures such as SuDs which would contribute to improving the water environment.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D,	OPDC area	The policy seeks to deliver well designed and sustainable buildings. It could include water

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				I, R, M		efficiency measures such as SuDS which would contribute to improving the water environment.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no direct link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, D, I, R, M	OPDC area	This policy seeks the delivery of green infrastructure which would support the enhancement of biodiversity.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, D, I, R, L	OPDC area	The policy explores the idea of green spaces and biodiversity areas being incorporated into roof design. This will help to have a positive effect on the IIA Objective.
		D5	0~~+~~	~~S, M, L-T, D, I, R, L~~	~~OPDC area~~	There is no direct link between the policy and the IIA Objective.~~This policy seeks that development will not adversely affect amenity in terms of microclimates, air quality, noise, daylight/sunlight, lighting and wind turbulence which may have a positive effect on the IIA Objective.~~
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	0			There is no direct link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	0			There is no direct link between the policy and the IIA Objective.
		D5	0~~+~~	~~S, M, L-T, D, I, R, L~~	~~OPDC area~~	There is no direct link between the policy and the IIA Objective.~~This policy seeks that development will not adversely affect amenity. This includes air quality, noise, daylight/sunlight and lighting which may have a positive effect on the IIA Objective.~~
		D6	+	S, M, L-T, D, I, R, L	OPDC area	The policy states that private residential open space should be positioned away from sources of noise and poor quality air that would make them unpleasant to use The policy also states

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						that residential development should be located away from and designed to mitigate light pollution all of which ~~which~~ would score positively against this IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	+	S, M, L-T, D, I, R, L	OPDC area	The policy seeks to locate all dedicated child play space away from pollution hotspots. This would score positively against this IIA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	D1	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high quality design process and making use of the OPDC Place Review Group and Community Place Review Panel would help to ensure that assets and their settings would be protected as well helping to conserve the historic environment.
		D2	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D3	0	N/A	N/A	There is no direct link between the policy and the IIA Objective.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of well-designed buildings would support the IIA Objective through careful design that respects its surroundings and conserves the historic environment, heritage assets and their setting.
		D5	+	S, M, L-T, I, R, M	OPDC area	The policy aims to undertake proactive engagement with Historic England, thus scoring positively against this objective.
		D6	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide high level amenity and quality environment for building users and surrounding areas which would enable an approach to development that would be sensitive to the existing local area which would likely respect and complement features including heritage assets and their setting.
		D7	+	S, M, L-T, I, R, M	OPDC area	The policy aims to use views defined in the OPDC Heritage Strategy and relating to the setting of heritage assets, which will score positively against this objective.
		D8	++	S, M, L-T, D, R, H	OPDC area	The policy would directly support the IIA Objective as it seeks to identify, conserve and~~,~~ enhance ~~and improve access to~~ the historic environment, heritage assets and their setting. Furthermore, any proposals that ~~-~~have the potential to impact heritage assets and their settings would have to submit a Heritage Impact Assessment to identify and mitigate any negative impacts. The policy also seeks to ensure heritage assets contribute to improving and creating a sense of place where appropriate and address Heritage at Risk.
		D9	0			There is no direct link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks provision of public realm that facilitates the use and enjoyment of spaces and to improve the network of streets, to connect places together and breakdown severance all of which would contribute towards increasing community cohesion and reducing social exclusion.
		D3	+	S, M, L-T, I, R, L	OPDC area	The development of inclusive design that is safe and accessible and addresses existing barriers would contribute towards community cohesion.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.
		D5	+	S, M, L-T, I, R, L	OPDC area	The delivery of new buildings would contribute to creating a sense of place and would partially support the IIA Objective.
		D6	+	S, M, L-T, I, R, L	OPDC area	The provision of a high level of amenity and quality environment would help to support community cohesion and welfare.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, I, R, L	OPDC area	The improvement and enhancement of the historic environment and heritage features within the area may contribute partially towards supporting community cohesion by recognising local identity.
		D9	+	S, M, L-T, I, R, M	OPDC area	By having play areas for children, this can positively encourage community cohesion and welfare and help reduce social exclusion.
14	Improve safety and reduce crime and the fear of crime	D1	+	S, M, L-T, I, R, L	OPDC area	The policy primarily focuses on place-making through the provision of high quality architectural and landscape design quality. This could make contributions towards reducing fear of crime.
		D2	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to provide safe public realm and improving the network of streets which would help to improve safety.
		D3	+	S, M, L-T, I, R, L	OPDC area	The policy seeks to deliver accessible and inclusive design. In doing so, the policy will help to deliver safe and permeable development. This will help to reduce crime and fear of crime.
		D4	+	S, M, L-T, I, R, L	OPDC area	The policy identifies the need for development to provide a balanced approach between its security and design. The supporting text makes reference to the need to have regard to national and London guidance as well as working with a number of security related stakeholders. The London Plan policy 7.3 provides guidance in relation to Secured by Design.
		D5	0			There is no direct link between the policy and the IIA Objective. However, policy D4 would

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						also apply to tall buildings to achieve a safe environment.
		D6	+	S, M, L-T, I, R, L	OPDC area	By seeking to deliver high quality amenity within the public realm and within development, the increased use of spaces and buildings will likely result in natural surveillance. This will help to address crime and reduce fear of crime. The London Plan policy 7.3 provides guidance in relation to Secured by Design.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	+	S, M, L-T, I, R, M	OPDC area	This policy states that the play areas should benefit from natural surveillance which can discourage anti-social behaviour.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	D1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to produce a high-quality design. It can help improve people's physical, mental and emotional health and well-being.
		D2	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to provide welcoming and safe public realm network that facilitates the use and enjoyment of spaces while responding to local character and integrating with surroundings. This would contribute towards maximising the wellbeing of the population through enabling safety, enhancing community spirit all of which would support community cohesion. It would also contribute to promoting healthy living giving greater opportunities for walking and cycling which would promote health benefits.
		D3	+	S, M, L-T, I, R, L	OPDC area	The delivery of inclusive design which is accessible and addresses existing barriers of the physical environment would make contributions towards maximising wellbeing of the population.
		D4	+	S, M, L-T, I, R, L	OPDC area	The policy seeks development to deliver high quality design that will have a positive impact on the health and wellbeing of people. Specifically it looks to deliver a high quality of life for building users. This will have a positive effect on this IIA Objective.
		D5	+	S, M, L-T, I, R, L	OPDC area	This policy seeks to minimise negative impacts on the amenity of space surrounding tall buildings and to deliver social infrastructure alongside wider benefits to the local community. These elements will have a positive effect on this IIA Objective.
		D6	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high level of amenity and quality environment for building users would contribute towards maximising the health and wellbeing of the population.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	+	S, M, L-T, I,	OPDC area	Encouraging children to play outside has a positive impact on their health and wellbeing and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, M		promotes healthy lifestyles.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	0			There is no direct link between the policy and the IIA Objective.
		D3	0			There is no direct link between the policy and the IIA Objective.
		D4	+	M, L-T, I, R, L	OPDC area	The policy primarily addresses new building design which could include education facilities which would support access to education and wider lifelong learning.
		D5	0			There is no direct link between the policy and the IIA Objective.
		D6	0			There is no direct link between the policy and the IIA Objective.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	0			There is no direct link between the policy and the IIA Objective.
		D9	+	M, L-T, I, R, L	OPDC area	By encourage children to play outside, this could have positive effects on early years education.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, I, R, L	OPDC area	Social and economic wellbeing could be partly supported through improvements to public realm and street network using a Healthy Streets Approach (set out in SP4) to support access to employment and training facilities.
		D3	+	S, M, L-T, I, R, L	OPDC area	Inclusive design aims to promote the wellbeing of members of the public, thus scoring positively against this objective.
		D4	+	S, M, L-T, I, R, L	OPDC area	The delivery of well-designed buildings could help to support social and economic wellbeing through the delivery of a high quality environment that will likely support local investment and development.
		D5	+	S, M, L-T, I, R, L	OPDC area	The delivery of tall buildings could help to support social and economic wellbeing as the policy seeks to provide floorspace for small businesses which commonly create new employment opportunities.
		D6	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high-level amenity and quality environment for building users and surrounding areas would help to support social and economic wellbeing as it will create new facilities and shops in the area.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area	The conservation, enhancement and improvement of the historic environment and heritage assets help to generate social and economic benefits for OPDC and would therefore partially support the IIA Objective as it will encourage tourism in the area.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		D9	+	S, M, L-T, I, R, M	OPDC area	Provision of play spaces for children can help to reduce social exclusion and promote social wellbeing and community cohesion.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	D1	0			There is no direct link between the policy and the IIA Objective.
		D2	+	S, M, L-T, I, R, L	OPDC area	Inward investment would be encouraged through the delivery of high quality public realm that facilitates the use and enjoyment of spaces.
		D3	+	S, M, L-T, I, R, M	Old Oak, Park Royal, and Wormwood Scrubs	The delivery of an inclusive and accessible design environment would increase attractiveness within these areas and would help to encourage inward investment.
		D4	+	S, M, L-T, I, R, M	OPDC area	The delivery of exemplary and sustainable buildings would enable the creation of attractive areas which would help to encourage inward investment alongside investment within existing communities.
		D5	+	S, M, L-T, I, R, M	OPDC area	The delivery of high quality tall buildings will help to support local identity which will likely support inward investment.
		D6	+	S, M, L-T, I, R, M	OPDC area	The delivery of a high-level amenity and quality environment for building users and surrounding areas would help to promote the attractiveness of the local area as a place to live and work which would help to attract inward investment and would support the creation of economic growth.
		D7	0			There is no direct link between the policy and the IIA Objective.
		D8	+	S, M, L-T, I, R, M	OPDC area	Conserving and enhancing the historic environment and heritage could make contributions to encouraging inward investment.
		D9	0			There is no direct link between the policy and the IIA Objective.

Table D-4 Environment and Utilities

EU1: Open Space
EU2: Urban Greening and Biodiversity
EU3: Water
EU4: Air Quality
EU5: Noise and vibration
EU6: Waste
EU7: Circular and Sharing economy
EU8: Sustainable materials
EU9: Minimising Carbon Emissions and Overheating
EU10: Energy Systems
EU11: Smart Technology
EU12: Extraction of minerals
EU13: Land contamination

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	EU1	++	S, M and L-T, D, R, M	OPDC area	Ensuring the delivery of a minimum of 30% of the developable area to be publicly accessible open space would lead to a positive effect against this IIA objective as it would directly enhance the built environment and encourage place-making.
		EU2	++	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to create new open spaces and ~~enhance~~ protect biodiversity would lead to a positive effect on the IIA Objective as it would directly enhance the built environment and encourage 'place making'. For this reason, a major positive score has been recorded.
		EU3	+	M and L-T, I, R, L	OPDC area	The policy would indirectly contribute to ensuring new buildings are appropriately designed i.e. through ensuring they do not lead to inappropriate run off or lead to an unacceptable demand on water resources.
		EU4	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to the creation of safe and welcoming spaces. The policy also aims to deliver high quality soundscapes.
		EU6	?			The relocation of waste and recycling sites (depending upon the final design) may lead to a detrimental effect on landscape character. *Due to this uncertainty it is recommended that the policy is strengthened to provide references to* policy D6 and the Places Chapter.
		EU7	+	S, M and L-T, D, R, M	OPDC area	The use of circular and sharing economy can contribute to place making by providing communal space and improving walking and cycling mobility. This would directly enhance the built environment and encourage place-making.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	?			Seeking to support and facilitate the provision of infrastructure to deliver a decentralised energy network within major new development may affect the character and quality of the built environment of the OPDC area depending on its visual appearance. *Due to this uncertainty it is recommended that the policy is strengthened to provide references to* policy D6 and the Places Chapter.
		EU11	+	S, M and L-T, D, R, M	OPDC area	Promoting the area as a global leading location for the exploration and implementation of smart city technology, concepts and systems would benefit this IIA Objective as it actively encourages the use of contemporary technology. The policy supporting text aims to improve quality of life and give access to place makers and service providers to provide joined up and efficient services that respond to customer needs, which is important in place-making.
		EU12	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU13	+	S, M and L-T, D, R, M	OPDC area	The policy scores positively against the IIA objective as the IIA objective aims to create new open space which will require land contamination mitigation which the policy seeks to improve
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	EU1	+	S, M and L-T, D, R, M	OPDC area	The supporting text explores the idea that open spaces are crucial for high density building developments to meet local needs.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The supporting text explores the idea that open spaces are crucial for high density building developments to meet local needs.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	EU1	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so all land-use proposals will score positively against this IIA objective.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so all land-use proposals will score positively against this IIA objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The majority of land in OPDC is previously developed land so the most of new development will occur on previously developed land, thus scoring positively against this IIA objective. The policy aims for at least 20% of material to be from recycled waste. This too will positively affect the IIA objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	++	L-T, D, R, M	OPDC area	The policy ensures that development would not be permitted until effective measures are taken to manage the risk of contaminated land through treating, containing or controlling. This would therefore fulfil this IIA Objective as it would contribute to a scheme of land remediation and improve soil quality over the long term.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	EU1	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to contribute or deliver local Green Streets which are fully accessible and designed predominantly for high pedestrian and cycle flows. This would have a positive effect against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area	Ensuring air quality assessments are undertaken for all major development within the OPDC area would ensure that the impact of traffic (mitigating the impact of construction traffic is listed as a sub-objective) is minimised as the assessment would also outline mitigation measures to reduce any identified impacts. For this reason a positive score has been recorded over the short to long term.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	+	S, M and L-T, D, R, L	OPDC area	The policy seeks to investigate the movement of waste by sustainable means of transport, including by rail and by the Grand Union Canal which may mitigate impacts on the transport network. It also seeks to design out waste from construction which may also mitigate impacts on the transport network.
		EU7	+	S, M and L-T, D, R, L	OPDC area	Mobility and transport and discussed in the supporting text. Walking and cycling will be encouraged and low carbon and zero emission vehicles will be promoted.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, L	OPDC area	Mineral extraction can have negative impacts on the local transport network. Mitigating factors within the policy can neutralise impacts on the local transport.
		EU13	0			There is no clear link between the policy and the IIA Objective.
5	Improve access to well designed,	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	EU3	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring they do not lead to inappropriate run off, flood risk or unacceptable water demand.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed and located through ensuring a buffer is in place between residential and commercial uses.
		EU6	+	S, M and L-T, I, R, M	OPDC area	The policy would indirectly contribute to ensuring new homes are appropriately designed by incorporating appropriate waste space in the design of new buildings.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy aims to create well designed buildings with materials which support healthy living. This will have a positive effect against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy aims to create well designed buildings with materials which will help deliver a zero-carbon strategy in London. This will score positively against the IIA objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU13	0			There is no clear link between the policy and the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	EU1	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the IIA Objective through promoting the use of sustainable drainage systems and incorporated mitigation for the heat island effect within new development.
		EU2	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy aims to deliver new urban greening improvements by delivering a range of habitats that are resilient to climate change.
		EU3	++	S, M and L-T, D, R, M	OPDC area and wider area	The policy positively fulfils the IIA Objective through ensuring all developments that are located in flood risk areas which meet the thresholds set out in DEFRA and EA guidance should undertake a Site Specific Flood Risk Assessment (FRA). Policy also strongly ~~promoting~~ promotes the use of ~~-~~sustainable drainage techniques within new development along with implementing flood risk management solutions identified in the relevant borough's Surface Water Management Plans.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, D, R, M	OPDC area and wider area	This objective explores the use of sustainable resources which can help minimise contributions to climate change.
		EU8	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy supports the use of materials which will reduce the urban heat island effect as well as reducing energy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	+	S, M and L-T, D, R, M	OPDC area and wider area	The policy aims to minimise carbon emissions through low carbon heat sources and utilising heat networks to optimise network efficiency. By reducing carbon issues this will contribute to improving climate change adaptation.
		EU10	+	S, M and L-T, I, R, M	OPDC area and wider area	The policy is principally focused on ensuring new major development is able to accommodate energy demand and supports the use of low carbon cooling networks in non-residential buildings. The supporting text discusses low carbon energy sources and harnessing heat from local energy sources, so this 'reuse' could indirectly contribute to reducing heat island
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil	EU1	+	S, M and L-T, I/D, R, L	OPDC area	The policy seeks to contribute or deliver local Green Streets which are fully accessible and designed predominantly for high pedestrian and cycle flows. There would be very restricted access to motorised vehicles. This would discourage the motorised vehicles which in turn will lead to less pressure on fossil fuel resources for petrol, thus having a positive effect against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste generated by new development through using waste as a resource e.g. through maximising the use of secondary materials and the opportunities for reuse or recycling of materials remaining from construction and investigating the potential for

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	fuels for transport, heating and energy					on-site energy recovery from waste. This would benefit the IIA Objective as it would contribute to minimising the resource requirements and outputs for new development.
		EU7	+	S, M and L-T, D, R, M	OPDC area and wider area	This objective explores the use of sustainable resources which can help minimise contributions to climate change and energy from waste. Policy seeks to promote car clubs in accordance with Policy T4 including the deployment of suitable electric vehicle charging infrastructure.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The policy aims to use sustainable materials which can reduce the need to use fossil fuels to process them and will have a positive effect against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	The policy aims to reduce carbon emissions through smart technologies. This will discourage the use of fossil fuels which release these emissions and have a positive effect against the IIA objective.
		EU10	++	M and L-T, D, R, M	OPDC area	The policy supports and seeks to facilitate the provision of infrastructure to deliver a decentralised energy network as part of new major development. This would positively benefit the IIA Objective as would encourage new major development to be more self-sufficient over the medium to long term and help to deliver low carbon cooling networks where feasible and appropriate.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, M	OPDC area	The extraction of minerals can have a negative impact and use resources. However, mitigation included within the policy will neutralise these effects.
		EU13	0			There is no clear link between the policy and the IIA Objective.
8	To minimise production of waste across	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to reduce waste and use it as a resource particularly on building sites. It also commits to investigating the potential for the movement of waste and recyclable materials during construction by sustainable means of transport, including by rail, and by the Grand Union Canal. All of which would promote the circular economy for the production of waste, increase the use of recycled materials in construction and maximises the use of innovative waste collection. As the policy fulfils the IIA Objective and its sub-objective a major positive score has been recorded.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Major developments must demonstrate how circular economy principles have informed the design and implementation of energy and waste infrastructure which will have a positive effect against this IIA objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	The use of sustainable materials includes recycled material. The policy aims for a minimum of 20% of the total material value of new buildings, infrastructure and landscape works to derive from reused or recycled content
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-T, D, R, L	OPDC area	Although not explicitly mentioned in the policy the implementation of smart city technology may benefit this IIA Objective as it could encourage innovative waste collection.
		EU12	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU13	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to remediate contaminated land. This would therefore partially fulfil the IIA Objective through contributing to the sustainable management of contaminated soils.
9	Improve the quality of the water environment	EU1	+	S, M and L-T, D, R, M	OPDC area	Provision of green open spaces can help natural infiltration rates. More open green spaces will also result in fewer hard surfaces which can transport pollutants in surface run-off.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to maximise opportunities to protect and / or enhance biodiversity in the Grand Union Canal and protect, enhance, and creates a network of multi-functional water spaces. It also aims to integrate planting as part of SuDS systems. This would therefore help to meet the IIA sub-objectives, more specifically *'to promote the quality of local watercourses'.*
		EU3	++	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure new development proposals promote integrated water management, through addressing surface and waste-water disposal capacity issues, sustainably managing water supply and minimising water consumption. All of which promotes efficiency in the use of water. In addition, the policy also seeks to ensure new development protects and improve the water environment of the Grand Union Canal and other watercourses in accordance with the Water Framework Directive. This would contribute to the protection of local water courses. Policy also takes steps to ensure sufficient capacity within the sewerage network is demonstrated as part of an applicant's Water Efficiency, SUDs and Drainage Statement.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Major development programmes will be required to demonstrate how circular economy principles have informed the design and implementation of water infrastructure. This will have a positive impact against the IIA objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+/-	S, M and L-T, D, R, M	OPDC area	Mineral extraction can result in water pollution. Mitigating factors within the policy ensure water quality will not be polluted.
		EU13	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that the remediation of contaminated land for new development does not lead to the contamination of any watercourse, water body or aquifer. As the policy directly seeks to prevent the risk posed to the water environment from the run-off of contaminants a positive score has been recorded.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	EU1	++	S, M and L-T, D, R, M	OPDC area	The policy aims to enhance existing open spaces and aims to contribute to 30% of OPDC becoming open space. Creating new open spaces and enhancing existing ones will have a major positive effect against this objective.
		EU2	++	S, M and L-T, D, R, M	OPDC area	A major positive score has been recorded against the IIA Objective as the policy seeks to ensure all new development conserves / enhances existing biodiversity, increases connectivity of habitats through the provision of green infrastructure and protecting designated sites resulting in no net loss of local biodiversity.
		EU3	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure development proposals within Park Royal and Old Oak include measures to protect and improve the ecological value of the Grand Union Canal and other watercourses. This may contribute to improving the existing poor biological quality of Grand Union Canal and conserving overall biodiversity across the plan area.
		EU4	+	S, M and L-T, D, R, M	OPDC area	By mitigating against any negative impacts if development on air quality, this could have a minor positive impact against the IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	+	S, M and L-T, D, R, M	OPDC area	By mitigating against any negative impacts if development on noise, this could have a minor positive impact against the IIA objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	S, M and L-T, D, R, L	OPDC area	Seeking to remediate contaminated land within the OPDC area and guarding against the risk of contaminated run off to watercourses would benefit the IIA Objective and may increase biodiversity on brownfield sites. However, this would be dependent upon the final development on the site. A low certainty has therefore been recorded.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	EU1	+	S, M and L-T, D, R, M	OPDC area	The policy aims to ensure there will be appropriate standards of air and noise quality in open spaces, which will score positively against the IIA objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4	++	L-T, D, R, M	OPDC area	The policy states that that OPDC will seek to improve air quality and minimise air pollution impacts on health the natural and built environment and on amenity. It also outlines that they require new major development to be accompanied by an air quality assessment considering potential impacts of and exposure to pollution and implementing mitigation measures to reduce the effects. This would ensure that new major development provides adequate mitigation measures to reduce any predicted adverse effects. This may over the long term contribute to the removal of the designated AQMA within the area. For the reasons outlined above effects are recorded as major positive.
		EU5	++	S, M and L-T, D, R, M	OPDC area	The principal focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise and vibration assessment thereby identifying and mitigating potential impacts. Therefore, effects have been recorded as major positive.
		EU6	+	M and L-T, I, R, L	OPDC area	The policy commits to designing out waste from construction sites and maximising waste generated for re-use in construction – over the medium to long term this may lead to a reduction in required traffic movements which in turn may contribute to minimising air pollution.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	+	S, M and L-T, D, R, M	OPDC area	Development proposals will be supported when they incorporate high quality materials with noise absorbing properties. This will score positively against the IIA objective.
		EU9	+	S, M and L-T, D, R, M	OPDC area	By reducing carbon emissions with help from smart technologies, this will have a positive impact against air quality.
		EU10	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	+	S, M and L-T, D, R, M	OPDC area	Applications for mineral extraction will be supported when they adequately protect the amenity of nearby residents and businesses from the effects of the operations, which includes air quality and noise.
		EU13	0			There is no clear link between the policy and the IIA Objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	EU1	++	M and L-T, I, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the IIA Objective as it would contribute to promoting the historical interpretation of heritage assets, including the canal using multifunctional green infrastructure. In addition, green infrastructure would also contribute to enhancing local views and landscapes. For this reason, a major positive score has been recorded.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	+	M and L-T, I, R, M	OPDC area	The policy would ensure surface water runoff is managed and flood risk management solutions are implemented as part of new development. This would protect heritage assets over the medium to long term from flood damage.
		EU4	+	M and L-T, I, R, M	OPDC area	Poor air quality can damage historic buildings. This policy tries to avoid poor air quality, thus will have a minor positive effect against this IIA objective.
		EU5	+	M and L-T, I, R, M	OPDC area	Noise and vibration mitigation included within the policy can protect OPDC's historic character. Soundscape is important in ensuring noise features such as water flows are not disturbed.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	EU1	+	S, M and L-T, D, R, M	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening would lead to a positive effect on the IIA Objective as it would directly increase connectivity and may help to create social linkages wit surrounding communities. For this reason, effects have been recorded as beneficial.
		EU2	+	S, M and L-T, D, R, M	OPDC area	The policy seeks to ensure that development helps to balance the built and natural environment through a strategic and co-ordinated approach. For this reason, effects have been recorded as beneficial.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	+	S, M and L-T, D, R, M	OPDC area	The supporting text discusses improving and ensuring open spaces not affected. Open spaces are important in encouraging outdoor activity which in turn can have a positive effect against the IIA objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	+	S, M and L-T, I, R, L	OPDC area	Guarding against inappropriate increases in noise levels from major development would indirectly contribute to maintaining / or potentially improving the quality of the public realm, recreation and play spaces which would benefit the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, D, R, M	OPDC area	Ensuring development has a circular economy and ensuring all economic profits befit the OPDC area, this can be beneficial against the IIA objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
14	Improve safety and reduce crime and the fear of crime	EU1	0			There is no clear link between the policy and the IIA Objective.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	0			There is no clear link between the policy and the IIA Objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	EU1	+	S, M and L-T, D, R, L	OPDC area	By creating more open spaces, it aims to seek, protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective within OPDC as it can encourage outdoor exercise.
		EU2	+/-	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to social infrastructure and encourage more active lifestyles. For these reasons effects have been recorded as major positive.
		EU3	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU4	+	M and L-T, D, R, M	OPDC area	The policy states that OPDC will seek to improve air quality and minimise air pollution impacts on health through requiring new major development proposals to meet a set criteria. For this reason, effects have been recorded as positive.
		EU5	+	S, M and L-T, D, R, M	OPDC area	The principal focus of the policy is to ensure that new development does not lead to unacceptable increases in noise. The policy aims to achieve this through requiring new development applications to be accompanied by a noise assessment, which would include mitigation measures that would guard against any effects on health and quality of life. Therefore effects have been recoded as positive.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, D, R, M	OPDC area	By delivering a shared economy, this support the IIA objective about shared community use, so will score positively against this IIA objective.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	+	M and L-T, D, R, H	OPDC area	The policy requires developers to complete the implementation of agreed measures to assess and abate any risks to human health for this reason effects have been assessed as positive
16		EU1	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	To improve the education and skills levels of all members of the population, particularly vulnerable groups	EU2	+	M and L-T, D, R, H	OPDC area	In circumstances when it is not possible to protect a SINC, developers will be expected to support development of educational materials. This will score positively against the IIA objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, I, R, L	OPDC area	The development of maker and mender centres in which members of the public can take, make and repair products could indirectly support the IIA objective by supporting jobs.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-T, D, R, H	OPDC area	The policy aims to provide educational services, thus scoring positively against the IIA objective.
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	EU1	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development includes open space, the policy will seek to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons effects, have been recorded as positive
		EU2	+	S, M and L-T, D, R, L	OPDC area	Ensuring all new development seeks to protect, enhance, and helps create a network of multi-functional green and water spaces connected by street greening may lead to a positive effect on the IIA Objective as may increase accessibility to employment and training and improve wellbeing. For these reasons effects have been recorded as positive.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	S, M and L-T, I, R, L	OPDC area	The development of maker and mender centres could indirectly support the IIA objective by creating new jobs.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	0			There is no clear link between the policy and the IIA Objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	EU1	+	S, M and L-T, I, R, L	OPDC area	Accessible open spaces and green infrastructure plays an important role in making an attractive place. This is turn can encourage investment alongside homes and jobs.
		EU2	0			There is no clear link between the policy and the IIA Objective.
		EU3	0			There is no clear link between the policy and the IIA Objective.
		EU4	0			There is no clear link between the policy and the IIA Objective.
		EU5	0			There is no clear link between the policy and the IIA Objective.
		EU6	0			There is no clear link between the policy and the IIA Objective.
		EU7	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its focus of a circular and sharing economy.
		EU8	0			There is no clear link between the policy and the IIA Objective.
		EU9	0			There is no clear link between the policy and the IIA Objective.
		EU10	0			There is no clear link between the policy and the IIA Objective.
		EU11	+	M and L-T, D, R, M	OPDC area	The policy may encourage inward investment through its aspiration to become a global leading location for the exploration, exploitation, and implementation of smart city technology, approaches and systems. For this reason, effects have been recorded as positive.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		EU12	+	M and L-T, D, R, M	OPDC area	Mineral extraction can create new job opportunities and encourage investment within mineral extraction. This will score positively against the IIA objective.
		EU13	0			There is no clear link between the policy and the IIA Objective.

Table D-5 Transport

T1: Roads and streets
T2: Walking
T3: Cycling
T4: Parking
T5: Rail
T6: Buses
T7: Freight, servicing and deliveries
T8: Construction
T9: Transport Assessments and Travel Plans

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	T1	+	S,M,L-T,I,R,M	OPDC and surrounding area	The policy seeks to deliver high quality streets that integrate effectively with the wider public realm which would help to support placemaking.
		T2	+	S,M,L-T,I,R,M	OPDC and surrounding area	Walking is the most sustainable form of transport and encouraging increased walking will have many advantages including more connected neighbourhoods. Increasing the connection of the public realm and internal routes to neighbouring areas alongside local and strategic cycle and walking networks including via green infrastructure networks and the canal would all support placemaking.
		T3	+	S,M,L-T,I,R,M	OPDC and surrounding area	Placemaking would be encouraged through the provision of state of the art cycling infrastructure, improved cycle wayfinding and signage and the enhancement of existing cycle connections to ensure they are safe, convenient, direct but not detrimental to pedestrians.
		T4	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to promote modal shift towards more sustainable modes, by reducing car parking spaces. This would help to support the street scene, public realm and placemaking.
		T5	+	S,M,L-T,I,R,M	OPDC and surrounding area	The policy seeks to support a number of rail improvements including the delivery of state of the art new rail stations as well as improved services on existing rail infrastructure these features would all contribute towards enhancing the built environment and improving accessibility.
		T6	+	S,M,L-T,I,R,L	OPDC and surrounding	The policy seeks the delivery of increased bus frequencies on existing and extended bus routes; to provide bus journey time reliability and to provide clear and legible signage. This

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					area	would encourage placemaking.
		T7	0			The policy would not have any significant effects for the objective.
		T8	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy seeks to provide support to reduce freight and construction trips which may have an indirect effect on amenity through reduced frequency of heavy goods vehicles (HGVs) on roads.
		T9	0			The policy would not have any significant effects for the objective.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	T1	0			The policy would not have any significant effects for the objective.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	The efficient use of land would be demonstrated through the provision of high quality, safe, accessible and inclusive walking networks.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	The provision of comprehensive, safe, attractive and inclusive cycle network through this policy would contribute towards optimising efficient land use.
		T4	+	S,M,L-T,I,R,M	OPDC and surrounding area	The provision of high quality connections through the delivery of state of the art transport infrastructure would contribute towards optimising efficient land use.
		T5	0			The policy would not have any significant effects for the objective.
		T6	0			The policy would not have any significant effects for the objective.
		T7	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8	0			The policy would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of	T1	+	S,M,L-T,D,R,M	OPDC and surrounding area	The strategic road network, particularly the A40 and A406, is vital to the successful operation of Park Royal and will be in the future to Old Oak. Road schemes should contribute to strategic land remediation.
		T2	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, walking routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.
		T3	+	S,M,L-T,I,R,L	OPDC and surrounding area	As a sustainable form of travel, cycle routes and infrastructure will be more likely to be in place in previously developed areas therefore encouraging brownfield development.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	contaminated land	T4	0			The policy would not have any significant effects for the objective.
		T5	0			The policy would not have any significant effects for the objective.
		T6	0			The policy would not have any significant effects for the objective.
		T7	+	S,M,L-T,I,R,L	OPDC and surrounding area	The policy supports freight, servicing and deliveries and it seeks to identify potential sites for consolidation centres and the provision of facilities for home deliveries within residential development. The delivery of facilities for home deliveries within residential development would help to optimise the efficient use of land.
		T8	0			The policy would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	T1	+	S,M,L-T,D,R,M	OPDC area	The policy primarily seeks to provide roads and streets that overcome severance and optimise connectivity. It also seeks to ensure that streets give priority to pedestrians, cyclists and buses which would improve accessibility.
		T2	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support walking through the provision of high quality, safe and accessible walking networks. This would help to minimise the need to travel through improving accessibility by walking.
		T3	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy seeks to support and encourage cycling through the provision of state of the art infrastructure and enhanced connections which would help to minimise the need to travel through improving accessibility by cycling.
		T4	+/-	S,M,L-T,D,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area due to the new development which would have a negative impact on the transport network, however, the policy primarily seeks to promote modal shift towards more sustainable modes through car parking limitations. Reducing car parking leads to a reduction in car ownership and car trips. This is likely to increase walking and cycling and use of public transport.
		T5	++	S,M,L-T,D,R,H	OPDC and surrounding area	The policy would deliver new rail infrastructure and would provide quality links between stations as well as improving services on existing infrastructure all of which would directly serve to improve accessibility. The delivery of two new overground stations would also help to manage capacity.
		T6	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy would deliver and contribute to the existing and future delivery of bus network and infrastructure to improve bus journey time reliability and priority measures as well as improved bus frequencies on new and extended routes which would help to improve accessibility.
		T7	+			The policy supports the use of freight consolidation centres and Delivery and Servicing Plans in order to mitigate impacts on the transport network.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T8	+	S,M,L-T,D, I, R M	OPDC and surrounding area	The policy seeks to provide for measures to reduce freight and construction trips, make use of rail and water transportation and to coordinate and phase construction projects to enable effective mitigation of transport impacts all of which would help to mitigate impacts on the transport network.
		T9	+	S,M,L-T,D,I,R,M	OPDC and surrounding area	Transport assessments and travel plans will help to deliver sustainable transport objectives and will seek to address congestion and impacts upon bus routes and on the primary route network and will ultimately support the mitigation of impacts upon the transport network.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	T1	?			A high-quality road network could contribute to the provision of a variety of homes in the area.
		T2	+	S,M,L-T,D,R,L	OPDC area	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents can benefit from this new transport superhub. This should improve access to housing developments through sustainable travel.
		T3	+	S,M,L-T,D,R,L	OPDC area	Private cycle parking for residents and provision for visitors should meet local needs and encourage cycling. Adequate cycle storage and infrastructure may increase the suitability of homes for potential residents.
		T4	+	S,M,L-T,D,R,H	OPDC area	The policy seeks to control the level of parking. For Old Oak, this means limiting car parking to 0.2 spaces for residential developments, promotion of car free development close to public transport hubs and securing zero car parking for non-residential developments. For Park Royal, this means limiting car parking to 0.2 spaces for residential developments and allowing limited car parking for non-residential development taking into account access to public transport and operational or business needs. Limited car parking should encourage sustainable travel and provide greater flexibility in improving access and providing different types of homes.
		T5	+	S,M,L-T,I,R,L	OPDC area and London wide	High quality rail infrastructure and a frequent rail service may help meet local needs. HS2 and Crossrail could benefit the area and support sustainable travel to surrounding residential areas.
		T6	+	S,M,L-T,D,R,L	OPDC area	Increased bus services and frequencies would provide improved connections to homes in Old Oak and Park Royal reducing dependence on the private car. This policy may have an indirect effect on housing locations.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T7	+	S,M L-T,I,R,M	OPDC area	OPDC will work collaboratively with stakeholders to ensure that freight movements are conducted in a safe, efficient and sustainable manner by encouraging the provision of facilities for home deliveries within residential developments. This will require sufficient access to housing areas.
		T8	0			The policy would not have any significant effects for the objective. However, a Construction Logistics Strategy will be developed by TfL and OPDC to ensure a coordinated approach which will minimise the disruption to surrounding residents.
		T9	?			Workplace and/or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. This requirement may indirectly affect housing provision, access and locations.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	T1	0			The policy would not have any significant effects for the objective.
		T2	0			The policy would not have any significant effects for the objective.
		T3	0			The policy would not have any significant effects for the objective.
		T4	+/-	S,M,L-T,D,I,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area leading to an increase in greenhouse gas emissions, however, this policy seeks to ensure that development is an exemplar of low carbon development and seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change mitigation. Further reduction in car parking would improve the mitigation against climate change.
		T5	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common as well as future proofing station design to enable smart technology to be implemented.
		T6	0			The policy would not have any significant effects for the objective. Provisions for roads in connection with the policy could contribute towards achieving the IIA Objective.
		T7	0			The policy would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
7	To minimise contributions to climate change through	T1	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation would be supported through the provision of high quality roads with robust and coordinated materials. The policy also seeks to mitigate impacts of development on surrounding local and strategic road networks as well as ensuring that streets prioritise pedestrians, cyclists and buses which would help to encourage sustainable movements.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	T2	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting walking networks and connectivity which would help to support the increase of journeys made by non-motorised transport and would contribute towards achieving the IIA Objective.
		T3	+	S,M,L-T,D,I,R,M	OPDC area	The policy primarily focuses on supporting and encouraging cycling which would help to encourage more people to cycle helping to increase non-motorised journeys and may help to reduce car reliance and emissions which would support climate change adaptation.
		T4	+/-	S,M,L-T,D,I,R,M	OPDC area	There is likely to be an increase in vehicle use in parts of the OPDC area leading to an increase in greenhouse gas emissions, however, this policy seeks to ensure that development is an exemplar of low carbon development and seeks to promote a modal shift towards more sustainable modes by imposing car parking limits which will help to support climate change mitigation. The policy also seeks to incorporate electric charging points for electric vehicles at all new parking spaces which would help to promote and encourage the use of electric cars, further supporting the IIA Objective.
		T5	+	S,M,L-T,D,I,R,M	OPDC area	Climate change adaptation could be achieved through provisions including a state of the art rail links and a state of the art rail station at old common helping to increase energy efficiency. Future proofing station design would also enable smart technology to be implemented.
		T6	0			The policy would not have any significant effects for the objective.
		T7	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to identify more efficient and sustainable ways of delivering goods including the use of cargo bikes as well as seeking to ensure that operators of all freight vehicles have attained the Gold Fleet Operator Recognition Scheme (FORS) accreditation demonstrating efforts to reduce emissions all of which supports climate change adaptation.
		T8	+	S,M,L-T,D,I,R,M	OPDC area	The policy seeks to reduce freight and construction trips and to make maximum use of rail and water transport for construction and freight which would help to support reducing transportation by road.
		T9	+	M,L-T,D,I,R,M	OPDC area	Travel plans provide a long term strategy to deliver sustainable transport objectives through an action plan and would ultimately contribute towards increasing energy efficiency, reducing congestion and emissions.
8	To minimise production of waste across all sectors in the plan area,	T1	0			The policy would not have any significant effects for the objective
		T2	0			The policy would not have any significant effects for the objective.
		T3	0			The policy would not have any significant effects for the objective.
		T4	0			The policy would not have any significant effects for the objective.
		T5	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	T6	0			The policy would not have any significant effects for the objective.
		T7	0			The policy would not have any significant effects for the objective.
		T8	++	S,M,L-T,D,R,H	OPDC area	The policy addresses freight and construction transport may enable benefits through minimisation techniques. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands. For residual movements, there is potential for bulk construction materials and/or waste to be transported by rail and canal although issues of local environmental impact and commercial viability will need to be addressed.
		T9	+	S,M,L-T,D,R,M	OPDC area	Transport assessments and travel plans would enable sustainable objectives which could include efficient transportation of waste materials from development sites which would partially support the IIA Objective.
9	Improve the quality of the water environment	T1	0			The policy would not have any significant effects for the objective.
		T2	0			The policy would not have any significant effects for the objective.
		T3	0			The policy would not have any significant effects for the objective.
		T4	0			The policy would not have any significant effects for the objective.
		T5	+	M,L-T,I,R,L	OPDC area	The provision of state of the art rail links and a state of the art rail station at old common could help to support the IIA Objective through incorporating water features into design.
		T6	0			The policy would not have any significant effects for the objective.
		T7	+/-	S,M,L-T,I,R,L	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment. However, in comparison to the noise and air pollution generated by freight movements by road, the water pollution would be less disruptive. The policy has been amended to include a requirement to ensure appropriate pollution prevention is considered when assessing proposals for water transportation.
		T8	+/-	S,M,L-T,D,R,M	OPDC area	The policy seeks to make maximum use of rail and water transport for construction and freight. Transportation for construction and freight across water has the potential to result in pollution of the water environment. However, in comparison to the noise and air pollution generated by freight movements by road, the water pollution would be less disruptive. Guidance has been provided in the environmental chapter to ensure appropriate pollution prevention is considered when assessing proposals for water transportation.
		T9	0			The policy would not have any significant effects for the objective.
10	Create and	T1	?			The value of the policy to the objective would be uncertain but new streets, if allied with

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	enhance biodiversity and the diversity of habitats across the area and its surroundings					suitable green infrastructure provision may act as green corridors.
		T2	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in walking routes with Green Infrastructure and improve wildlife connectivity
		T3	+	S,M,L-T,D,R,M	OPDC and London wide	This policy offers opportunities to tie in cycling routes with GI and improve wildlife connectivity
		T4	0			The policy would not have any significant effects for the objective.
		T5	+/-	S,M,L-T,D,R,M	OPDC and London wide	Whilst the construction of new stations and infrastructure may adversely affect biodiversity present, this is unknown at this stage. New stations could include planting schemes and biodiversity enhancements.
		T6	0			The policy would not have any significant effects for the objective.
		T7	0			The policy would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	T1	+/-	S,M,L-T,D,R,L	OPDC area	New streets may bring pollution closer to residents in those areas, or it may help relieve congestion elsewhere and hence have benefits.
		T2	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as walking provides an alternative to the private car.
		T3	+	M,L-T,D,R,M	OPDC area	The policy would benefit the minimisation of pollution as cycling provides an alternative to the private car.
		T4	+/-	S,M,L-T,D,R,M	OPDC area	OPDC will ensure the development area is an exemplar of low carbon development and will promote a modal shift towards more sustainable modes. There is likely to be an increase in vehicle use in parts of the OPDC Area due to the new development which would have a negative impact on air and noise pollution, however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts. The provision of charging points will encourage those people that use cars to use electric vehicles.
		T5	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		T6	+/-	S,M,L- T,D,R,L	OPDC area	The policy would not have any significant effects for the objective. The policy would benefit the minimisation of pollution as buses provide a sustainable alternative to the private car However, buses can cause pollution. Low carbon buses are addressed through this policy.
		T7	+/-	S,M,L- T,D,R,H	OPDC and surrounding area	The significant HGV activity in the development area can have negative impacts on the environment in terms of noise and air quality and causes congestion, particularly on Scrubs Lane. However, there is an attempt to limit and control the congestion.
		T8	+/-	S,M,L- T,D,R,M	London wide	Construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network and may increase pollution levels. However, the freight consolidation centre described in policy T8 could be used to reduce the number of construction vehicles required and the number of construction vehicle movements on the road network. Maximum re-use and recycling of waste and construction materials within the area will reduce transport demands.
		T9	+	S,M,L- T,D,R,M	London wide	Transport Statement or Transport Assessment which assesses the extent to which the development will support opportunities for sustainable travel that should minimise air, noise and light pollution.
12	To conserve and enhance the historic environment, heritage assets and their settings	T1	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T2	+	S,M,L- T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets and their settings.
		T3	+	S,M,L- T,I,R,M	OPDC area	Fewer cars will cause less disturbance and pollution which could affect heritage assets and their settings.
		T4	0			The policy would not have any significant effects for the objective.
		T5	+	S,M,L- T,I,R,L	OPDC and surrounding area	The policy would not have any significant effects for the objective. However, a focus on really high quality design should complement any existing heritage assets.
		T6	0			The policy would not have any significant effects for the objective.
		T7	?			The policy may not have any significant effects for the objective although it depends on the relative location of heritage assets.
		T8	?			Although construction work is short-term and temporary, it can affect heritage assets via direct physical disturbance and noise for example.
		T9	0			The policy would not have any significant effects for the objective.

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13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	T1	+	S,M-T,D,R,M	OPDC and surrounding area	The Healthy Streets Approach promotes social interaction and community cohesion. The policy aims to reduce severance and benefit connectivity.
		T2	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. *Guidance provided in policy D3.*
		T3	+	S,M-T,D,R,H	OPDC and surrounding area	Measures that encourage safe, accessible transport can help community cohesion. *Guidance provided in policy D3.*
		T4	+/-		OPDC and surrounding area	Increasing vehicle use in parts of the OPDC area would have a negative impact on social interaction and community cohesion; however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts.
		T5	+	S,M-T,D,R,H	OPDC and surrounding area	The policy promotes sustainable transport and hubs like this can benefit communities by providing a central focus, encouraging sustainable movement.
		T6	++	S,M-T,D,R,H	OPDC area	Connections to new stations should take priority to capitalise on new transport services. There is also a need to secure improved bus connections between Old Oak and Park Royal to ensure that the existing community can take advantage of the benefits the new interchange at Old Oak Common would bring to the area.
		T7	0			The policy would not have any significant effects for the objective.
		T8	?			Large construction projects and new development may help create a greater sense of place and build the existing community. The Construction Logistics Strategy promises to minimise disruption to surrounding residents and business should prevent unrest in the community.
		T9	+	S,M,L-T,I,R,L	OPDC area	Transport Assessments and Travel Plans will aim to protect the livelihood of the community through ensuring transport safety, efficiency and mitigating the impact on the existing network. This should unite the community.
14	Improve safety and reduce crime and the fear of crime	T1	+			The policy would not have any significant effects for the objective.
		T2	+	S,M-T, D,R,M	OPDC area	The existing pedestrian environment within the development area is poor. There is limited permeability and a lack of lighting and active frontages, which creates an unwelcoming streetscape, a perception of poor personal security and a fear of crime, particularly after dark. However, the policy does aim to make walking routes safer and more legible for the users to provide clear, comprehensive and consistent wayfinding information and enable

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						pedestrians to complete more journeys on foot
		T3	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to promote safety and security measures for cyclists.
		T4	0			The policy would not have any significant effects for the objective.
		T5	+	M,L-T,D,R,L	London wide	There is a range of potential smart rail innovations that could be achieved with advances in security technology.
		T6	+	S,M-T, D,R,H	OPDC and surrounding area	The policy seeks to provide clear and legible signage for bus users. Infrastructure should include bus priority measures such as priority at junctions, bus gates and bus only links as well as suitably located bus stops, stands and welfare provision for drivers
		T7	+	S,M,L-T,D,R	London wide	The policy explains that the volume of freight and servicing movements raises challenges in terms of maintenance and management of the road network and the safety and environment for other road users. FORS is an overarching scheme that encompasses all aspects of safety, fuel efficiency, economical operations and vehicle emissions.
		T8	0			The policy would not have any significant effects for the objective.
		T9	0			The policy would not have any significant effects for the objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	T1	+	S,M,L-T,D,R,M	OPDC area	If new streets are well designed to deliver Healthy Streets with green infrastructure and improved connectivity they may benefit the objective and help to avoid social exclusion and mental health issues.
		T2	++	S,M,L T,D,IR,M	OPDC area and London wide	Providing a street network that is safe, attractive and easy to navigate, people will be encouraged to walk more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T3	+	S,M,L-T,D,IR,M	OPDC area, London and Nationwide	Providing a street network that is safe, attractive, and easy to navigate, people will be encouraged to cycle more, which will have social, economic, environmental and health benefits and support the viability of the development area.
		T4	+/-	S,M,L-T,I,R,M	OPDC area	Increasing vehicle use in parts of the OPDC area would have a negative impact on health and well-being; however, limiting parking spaces will deter residents and visitors from owning or using cars which will help to mitigate these impacts. Reducing car parking levels to lower levels would help to further reduce health inequalities and improve mitigation against the negative health impacts.

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		T5	+	S,M,L-T,D,R,H	OPDC area, London and Nationwide	Increased rail use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T6	+	S,M,L-T,D,R,H	OPDC area, London and Nationwide	Increased bus use can encourage more walking/cycling and reduce the use of a private car. This would reduce the levels of carbons emissions and therefore benefit the objective.
		T7	+/-	S,M,L-T,I,R,M	OPDC and surrounding areas	The significant HGV activity in the development area can have negative impacts on the health and well-being of the community. However, coordination of HGV activity and the provision of facilities for home deliveries within residential developments may help to mitigate against these impacts.
		T8	+/-	S,M,L-T,I,R,M	OPDC area	The policy highlights that construction traffic will increase the volume of HGVs and other construction vehicles on the local and strategic road network. This will need careful planning, coordination and management to minimise the negative impacts on health from increased volume of traffic, noise, vibration, air pollution, severance and road danger.
		T9	+	S,M,L-T,I,R,M	OPDC area	All development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network, and against the existing and potential availability of public transport, and its capacity to meet increased demand. Proposals that increase the availability of public transport and improve the environment for walking and cycling will lead to improvements in health and well-being and reductions in health inequalities.
16	To improve the education and skills levels of all members of the population, particularly vulnerable	T1	0			The policy would not have any significant effects for the objective.
		T2	+	S,M,L-T,D,R,M	OPDC area	The policy benefits walking routes which provide access to schools and higher education.
		T3	+	S,M,L-T,D,R,M	OPDC area	The policy benefits cycling routes which provide access to schools and higher education. *Guidance is provided in SP7.*
		T4	+/-	S,M,L-T,D,R,M	OPDC area	Increasing vehicle use in parts of the OPDC Area would have a negative impact on the environment for walking and cycling on routes to schools; however, limiting parking spaces

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	groups					will deter residents and visitors from owning or using cars which will help to mitigate these impacts. *Guidance is provided in SP7.*
		T5	+	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through rail use which will help improve access to schools and higher education.
		T6	++	S,M,L-T, D,R,M	OPDC area	The policy benefits connectivity through bus travel which will help improve access to schools and higher education. *Guidance is provided in SP7.*
		T7	0			The policy would not have any significant effects for the objective.
		T8	0			The policy would not have any significant effects for the objective.
		T9	+	S,M,L-T,D,R,M	OPDC area and London wide	All proposals for new or significantly expanded schools or other education or institutional uses should be accompanied by a Travel Plan. The Travel Plan could help improve levels of access to schools from a range of different areas.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	T1	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy seeks to enhance existing streets and junctions to mitigate the impacts of development on the surrounding local and strategic road network. A better road network in the OPDC area would better serve local communities and improve employment provision.
		T2	+	S,M,L-T,D,R,M	OPDC area and London wide	Redevelopment presents an opportunity to enhance existing and provide new pedestrian environments across Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from this new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area	The policy will benefit the objective by OPDC working with businesses in Park Royal to develop training and guidance and improve awareness of the benefits of cycling to employees to encourage more cycling. In Old Oak, redevelopment provides an opportunity to push the boundary and provide state of the art cycling infrastructure that can benefit everyone who lives and works in the area.
		T4	+/-	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes car free development close to public transport hubs and zero car parking for non-residential developments in Old Oak which is likely to have a positive impact on social and environmental wellbeing and help to improve the reliability of bus travel and other essential traffic. There is likely to be a strong demand for taxis and private hire vehicles (PHVs) generated by the HS2/ Crossrail/ National Rail interchange which is likely to have a negative impact on social wellbeing.
		T5	++	S,M,L-	OPDC area	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				T,D,R,H	and London wide	Common will be a key driver for regeneration in the area. When built out the core area at Old Oak will be served by approximately ten different rail services and over 200 trains per hour at peak times. This will benefit the social and economic wellbeing of the local people and provide sufficient access to key employment and training areas.
		T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that increased bus services and frequencies would provide improved connections to homes, office and retail destinations in Old Oak and Park Royal reducing dependence on the private car. This is of relevance for existing business in Park Royal where a high percentage of people live within 5-8km of the area which would make a reliable and frequent bus service a viable option for travelling to work.
		T7	0			The policy would not have any significant effects for the objective.
		T8	+	S,M,L-T,D,R,M	OPDC area	More construction work would provide an employment source for the local community.
		T9	?			Transport Assessments and Travel Plans will address any access issues to key services such as employment hubs.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	T1	+/-	S,M,L-T,D,R,M	OPDC area and London wide	The policy states that congestion at key junctions and on links providing access to strategic routes is a barrier to business growth. However, in Park Royal, the road network will need to prioritise the movement of freight to facilitate business growth. This will need to be carefully planned alongside the need to improve bus movements, pedestrians and cyclists and deliver a healthy street environment.
		T2	++	S,M,L-T,D,R,H	OPDC area	Walking as a sustainable form of transport can bring economic benefits. Through an increase in footfall, the vitality of an area is likely to increase and subsequently bring benefits to local businesses. Redevelopment presents an opportunity to enhance the existing pedestrian environment and deliver a high quality pedestrian environment in Old Oak and Park Royal. High quality pedestrian walking routes to Old Oak Common station from all areas will be vital to ensure residents, employees and business can benefit from the new transport superhub.
		T3	++	S,M,L-T,D,R,M	OPDC area and London wide	Investments in “end-of-journey” cycle facilities in the form of secure cycle parking, lockers and showers are also vital across Old Oak and Park Royal. Major employers, businesses and landowners should invest in this infrastructure, recognising its value and importance to their businesses, tenants and employees.
		T4	++	S,M,L-T,D,R,M	OPDC area and London wide	Sufficient car parking will need to be provided to meet the essential needs of developments, particularly ensuring that there are suitable places for disabled people, car clubs and electric cars and facilitating the successful operation of the Park Royal industrial estate.

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						This approach is justified by the very high level of public transport accessibility resulting from the planned and proposed investment. The need for access to a car can be met in part by dedicated car club spaces together with parking for disabled people.
		T5	++	S,M,L-T,I,R,H	OPDC area and London wide	The policy explains that the new HS2, Crossrail and Great West Mainline station at Old Oak Common will be a key driver for regeneration in the area. This should attract investment and benefit local businesses to improve the local economy.
		T6	+	S,M,L-T,D,R,M	OPDC area and London wide	The policy promotes sustainable bus travel. Increased bus frequencies, better journey time reliability, new and improved bus stops and a more efficient service should encourage inward investment and attract businesses to the area. This will have a positive effect on the local economy.
		T7	0			The policy would not have any significant effects for the objective.
		T8	+	S,M,L-T,D,R,M	OPDC and surrounding area.	The nearby delivery of HS2 and Crossrail may encourage other businesses and investment to move into the area. As such, the policy seeks to minimise the construction disruptions for existing businesses through the Construction Logistics Strategy and Construction Management Plans.
		T9	0			The policy would not have any significant effects for the objective.

Table D-6 Housing

H1: Housing supply
H2: Affordable housing
H3: Housing mix
H4: Family Housing
H5: Existing housing
H6: Build to rent
H7: Purpose-built Co-Living and other housing with shared facilities
H8: Gypsy and Traveller Accommodation
H9: Specialist housing
H10: Student Accommodation

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	H1	++	S, M, L-T, I, R, L	OPDC area	The policy seeks to deliver housing to contribute to meeting local and pan-London housing needs. The requirement for high quality design should lead to significant benefits against this objective. It also seeks to bring vacant dwellings back into use, which could enhance the built environment and improve sense of place locally.
		H2	++	L-T, I, R, L	OPDC area	The development of high quality affordable housing, up to 50% of the total new housing supply, can contribute to place-making. It will be appropriate located across the development with the same quality of appearance as market homes.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.
		H4	+	M, L-T, I, R, L	OPDC area	The policy aims to develop family housing which can encourage place-making by creating mixed and balanced neighbourhoods.
		H5	+	M, L-T, I, R, L	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use, as well as resist the loss of existing housing stock, apart from land within the SIL, which could improve sense of place locally.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	The PRS is the fastest growing housing tenure in London and can deliver new housing supply more quickly than market for sale housing helping to enhance the built environment and create a sense of place in the area.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could lead to some benefits against this objective. Supporting text indicates that where quality concerns exist about existing shared housing, their loss to an alternative housing uses will not be resisted or proposals to improve standards will be considered.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London which seeks to encourage a varied community and therefore contribute to a sense of place.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to benefit this objective to some degree.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in particular locations. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of communities. .
2	To optimise the efficient use of land	H1	+	M, L-T, I, R, M	OPDC area	This policy seeks to deliver a significant number of new homes and will lead to optimisation in the use of land previously used mainly for industrial purposes.
		H2	+	M, L-T, I, R, M	OPDC area	This policy seeks to deliver a significant number of new affordable homes and will lead to optimisation in the use of land.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	through increased development densities and building heights, where appropriate	H3	+	M, L-T, I, R, M	OPDC area	This policy seeks to provide a housing mix that meets housing need and is appropriate for the densities of the proposed development, providing for an efficient use of land.
		H4	+	M, L-T, I, R, M	OPDC area	This policy sets out specific design requirements for family housing that are consistent with the expected built form and density in the area.
		H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings providing for more efficient use of land.
		H6	+	M, L-T, I, R, M	OPDC area	This policy supports the development of purpose-built PRS housing which is likely to be built at high density and supporting this IIA objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		H8	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development. However, there is only one such site within the OPDC area currently. Any future provision will be based on the required number of pitches in accordance with national planning guidance. The space occupied by this land use is limited so overall it will not have a negative impact against this objective.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The key issues to consider within the Local Plan in relation to this policy highlight that new specialist need housing should be provided in new high density buildings. However, this is not reflected in the policy wording. *This recommendation has been addressed in the strategic polices on optimising development to provide a range of housing types at high densities.*
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
	Maximise the	H1	+	L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
3	reuse of previously developed land and existing buildings, including the remediation of contaminated land					dwellings back into use and the area has a large reservoir of brownfield land available that will be used to deliver a substantial amount of new housing to meet local and London housing needs. The policy states that 'Vacant Building Credit will be applied where it is verified that a building has not been made vacant for the sole purpose of redevelopment and has been vacant for at least five years.'
		H2	+	L-T, I, R, M	OPDC area	The policy seeks to provide substantial amounts of affordable housing which will be delivered on land with previous industrial uses thus maximising reuse of land as required under this objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to bring vacant dwellings back into use and aims to aid 'comprehensive regeneration' of the area
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	Meeting an identified need for shared housing within the plan area is considered to be an efficient use of land.
		H8	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	Gypsy and traveller sites are likely to be characterised by low density development. However, there is only one such site within the OPDC area currently. Any future provision will be based on the required number of pitches in accordance with national planning guidance. The space occupied by this land use is limited so overall it will not have a negative impact against this objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	Student accommodation could be considered to be an efficient use of land as it is likely to be high density.
4	Minimise the	H1	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	H2	0			There is no clear link between the policy and the IIA Objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	M, L-T, I, R, M	OPDC area	The policy seeks that new shared housing should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H9	+	M, L-T, I, R, M	OPDC area	The policy seeks that new specialist housing should be located in areas with high public transport access and facilities and services. This could help to create benefits against this objective.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	H1	++	L-T, D, R, M	OPDC area and London-wide	The policy should help significantly increase the supply of housing within the area to meet local and London housing need, through the creation of delivery targets, promotion of development opportunities and conversion of existing buildings, as well as through monitoring. The supporting text highlights that the conversion of larger dwellings to smaller, more affordable dwellings, will contribute to the supply of housing. This could create significant benefits against this objective.
		H2	++	L-T, D, R, M	OPDC area and London-wide	The focus of this policy is to create affordable and inclusive housing of a range of types and tenures included rented and intermediate, therefore scoring a major positive against this objective in terms of providing greater access to affordable housing. The policy aims to reach an overarching 50% affordable housing within the OPDC area.
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of significant benefits against this objective, in that it will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods.
		H4	+	M, L-T, I, R, L	OPDC area	The policy aims to provide ~~25%~~ family housing across all tenures in accordance with Policy H3. This is a balance between identified housing need, development viability and reflecting

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						the high density form of development In the policy, access to open spaces is included and careful design of housing which is to be designated for families is outlined to ensure that it suitable for families with children.
		H5	+	M, L-T, I, R, L	OPDC area	The policy could generate positive effects against this objective through the creation of additional housing through the conversion of existing dwellings and other types of buildings. The policy seeks to ensure that conversions of larger houses still include at least one family sized unit therefore seeking to meet a range of needs and~~provide at least one family sized unit within conversions. This should~~ help to maintain a mix of housing; however, it is unclear whether this proportion would meet local needs or not. As stated in the supporting text for policy H3, housing mix and needs will be identified more clearly in the next iteration of the local plan.
		H6	+	S, M, L-T, I, R, L	OPDC area and London-wide	This policy supports the development of purpose-built PRS housing which will diversify the tenure mix to be provided in the new development and meet a housing need. Further to this, Build to Rent requires schemes to deliver 35% affordable housing and 30% of this affordable housing to be at London Living Rent
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support identified local and London housing need. Supporting text indicates that where quality concerns exist about existing shared houses, their loss to any alternative housing uses will not be resisted and proposals to improve standards will be considered. This could help to increase quality locally over time.
		H8	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified local and London housing need in London. The study concluded that there are no requirements for additional pitches according to the planning definition but an additional 12 pitches will be needed for households who do not meet the definition. ~~Therefore~~Therefore, the policy seeks to include the need for the accommodation of gypsies and travellers.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to benefits against this objective as it seeks to support an identified housing need in London. Affordable housing is also sought within the policy for developments that include market led development aimed at older or vulnerable people. Policy also seeks to protect from the loss of existing specialist housing by only supporting proposals that can demonstrate there is no longer an identified local need for it.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-	The policy could lead to benefits against this objective as it seeks to support an identified local and London housing need. Specific requirements regarding design are not included within the policy.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					wide	
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	H1	+/-	S, M, L-T, I, R, L	OPDC area and London-wide	The policy seeks to deliver a significant number of new homes. The strategic policies on excellence and innovation promote high standards for sustainable development at high density and OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to improve adaption to climate change.
		H2	0			The policy seeks to deliver a significant number of new affordable homes. The strategic policies on excellence and innovation promote high standards for sustainable development at high density and OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to improve adaption to climate change.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural	H1	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new homes which could have negative effects against this objective, through an increase in the need for energy and transport. However, the strategic policies on excellence and innovation promoting high standards for sustainable development at high density and modern methods of construction could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development which will help to minimise contribution to climate change.
		H2	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new affordable homes -which could have negative effects against this objective, through an increase in the need for energy and transport. However, the strategic policies on excellence and innovation promoting high standards for sustainable development at high density and modern methods of construction sustainable and modern methods of construction could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	resources including fossil fuels for transport, heating and energy	H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the embodied energy required compared with the creation of new dwellings to meet the entire housing need. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. However, the policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on parking or other local amenities. *The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments.*
		H6	+	L-T, I, R, L	OPDC area	Purpose-built PRS is likely to be built in areas with good access to public transport and services and facilities which could help to create benefits against this objective in terms of access to transport.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H9	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on the emissions of greenhouse gases. *It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health.*
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective.
8	To minimise	H1	-	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new homes which could have negative effects against this objective, through an increase in the need for natural resources and the

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					creation of waste during the construction. However, design objectives could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and transportation in the future.
		H2	-	L-T, I, R, L	OPDC area	The policy seeks to deliver a significant number of new affordable homes which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste during the construction. However, design objectives could minimise this effect. ~~.~~ OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and transportation in the future.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the waste generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on local amenities.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources and the creation of waste during construction. However, design objectives could minimise this effect. OPDC has also produced an Environmental Standards Study to develop a series of environmental standards for the development. This will help to minimise waste production and transportation in the future.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
9	Improve the	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However,

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	quality of the water environment					design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+/-	M, L-T, I, R, M	OPDC area	The policy could have some benefits against this objective in that it seeks to optimise existing housing stock through the conversion of existing dwellings to two or more dwellings, which could reduce the pollution generated during construction activities. However, increased pressure on local infrastructure through an intensification of the population, could lead to negative effects on resource requirements and potential pollution. The policy seeks to minimise this effect through requiring that conversions do not result in cumulative stress on services and would not result in an adverse impact on local amenities.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be capable of connecting to utilities infrastructure and services. This could help to create benefits against this objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	across the area and its surroundings	H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative effects against this objective, through an increase in the need for natural resources. However, design objectives could minimise this effect.
		H7	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new shared houses are located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H8	+	M, L-T, I, R, M	OPDC area	The policy seeks that any new gypsy and traveller sites should be accessible to transport, services and facilities. This could help to create benefits against this objective.
		H9	+	L-T, I, IR, L	OPDC area and London-wide	The policy seeks that new specialist housing is located in areas with good access to public transport and services and facilities, which could help to provide some benefits against this objective in relation to reducing the need to travel and thus reducing the impacts from new development on local pollution levels.
		H10	+	M, L-T, I, R, M	OPDC area	The policy requires that new student housing should be in accessible locations, which could lead to some benefits against this objective through a potential reduction in an increase in

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						vehicular transport. Further, the requirement for consideration of the potential impact on the immediate and surrounding area and residential amenity, could help to reduce potential impacts from noise, air and light pollution.
12	To conserve and enhance the historic environment, heritage assets and their settings	H1	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H2	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H3	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy could lead to benefits against this objective, in that new housing will need to take into consideration the local character of the site and its ability to accommodate a mix of housing types and sizes.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	+	M, L-T, I, IR, L	OPDC area and surrounding boroughs	The policy seeks to ensure that conversions of existing buildings maintain the general character of the surrounding area. This could help to ensure that effects on the historic environment are minimised.
		H6	-	L-T, I, R, L	OPDC area	The policy could lead to the increased delivery of housing which could have negative implications for the historic environment through a significant change in the setting of the local area. However, design objectives and conservation measures where they are adopted could minimise this effect.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
13	Increase community cohesion and reduce social	H1	+	M, L-T, I, R, L	OPDC area	The policy seeks to significantly increase the housing supply in the area, providing more high quality homes for more people. This will increase community cohesion in the area. The policy also seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	exclusion to encourage a sense of community and welfare	H2	++	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to create affordable housing. This will increase community cohesion and reduce social exclusion –as more people will housed in suitable properties that are affordable either to own or rent. could
		H3	++	L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate significant benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities.
		H4	+	M, L-T, I, R, L	OPDC area	The policy seeks to ensure that any family housing is appropriately designed and accessible to useable amenity space. This could provide some benefits against this objective.
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, the general character of the surrounding area, and do not result in the cumulative stress on services.
		H6	+	M, L-T, I, IR, L	OPDC area	The policy aims to create developments for rental. This will have a positive effect against this IIA objective as it provides housing for those who cannot afford to buy a property in that area but can still rent and especially as leases are aimed for longer terms. This will encourage social inclusion, thus scoring positively against this objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity.
		H8	+	S, M, L-T, I, R, L	OPDC area and	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
					surrounding boroughs	*The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts.*
		H9	++	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Significant positive effects may be achieved through a requirement that accessible social networks are appropriate to the needs of the intended occupiers.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. The policy seeks to ensure that the development of student accommodation does not lead to an over-concentration of student accommodation in a particular location. In addition, proposals should not have an unacceptable impact on the immediate and surrounding areas, including residential amenity. Sites should be in accessible locations and not lead to the net loss of other forms of housing. These measures should ensure that a sense of place and community is maintained, although will not necessarily contribute towards the creation of more cohesive communities.
14	Improve safety and reduce crime and the fear of crime	H1	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2	+	M, L-T, I, R, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to increase the availability of affordable housing. This will promote an increased sense of community in the area which may help improve safety and help prevent crime and anti-social behaviour by providing a more inclusive and mixed community where households are suitably housed in homes that are genuinely affordable.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing inequalities.
		H4	+	M, L-T, I,	OPDC area	The policy aims to develop housing which is suitable for families. This could have a positive

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				IR, L		effect against the IIA objective as it can contribute to creating a sense of place and inclusive and mixed community which helps to create a safe neighbourhood with low levels of crime.
		H5	+	M, L-T, I, IR, L	OPDC area	The policy may lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, which could have some benefits.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards and are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which should help to reduce potential impacts on crime.
		H8	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The policy seeks to ensure that any new sites are accessible to services and facilities, and local social infrastructure. This could provide some benefits against this objective through potentially reducing the potential for anti-social behaviour.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+/-	S, M, L-T, I, R, L	OPDC area and surrounding boroughs	The introduction of student housing into the area could increase the potential for local crime, as students can be targets for crime, as well as causing potential anti-social behaviour if not managed effectively. However, ensuring a mix of housing throughout the area and that student housing does not result in a net loss of self-contained accommodation could lead to the minimisation of this potentially negative effect. Student housing will also be subject to a residential management plan which must specify how any impacts on neighbouring residents will be managed.
15	Maximise the health and	H1	+	M, L-T, I, R, L	OPDC area	The policy seeks to significantly increase the number of new homes and create an inclusive new place which can contribute towards greater levels of health and wellbeing for existing residents and new residents. It also seeks to promote the re-use of vacant dwellings. This

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	wellbeing of the population, reduce inequalities in health and promote healthy living					could help to enhance sense of community wellbeing as vacant dwellings could engender a sense of local decline and anti-social behaviour through reduced sense of community ownership.
		H2	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to create more affordable housing which can improve the health and wellbeing and reduce the inequalities in health outcomes of households who are struggling to find or sustain housing that is genuinely affordable and meets their needs in the local area~~.~~.
		H3	+	L-T, I, R, L	OPDC area	The policy could lead to the generation of some benefits against this objective, in that if will deliver a mix of housing to meet local needs, which could lead to the generation of mixed, balanced and sustainable neighbourhoods. This could generate benefits against this objective, through the potential creation of greater social equity through reducing geographical inequalities, leading to potential benefits for mental health as well as physical heath, through the provision of appropriate housing types.
		H4	+	S, M, L-T, I, R, L	OPDC area	The policy aims to improve access to open spaces and green spaces for families. This can encourage people to go outside more and exercise and interact with one another which can contribute positively to mental and physical health and wellbeing.
		H5	+	M, L-T, I, R, L	OPDC area	The policy could lead to the generation of benefits against this objective, as it seeks to promote the re-use of vacant dwellings. This could help to enhance sense of community wellbeing and thus improvements in mental health, as vacant dwellings can engender a sense of local decline and anti-social behaviour through reduced sense of community ownership. Further, the policy seeks that conversions of existing dwellings maintain the amenity of neighbours, and do not result in the cumulative stress on services. This could help to maintain existing health levels.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments meet relevant quality standards are located in areas with good public transport accessibility and facilities, could also lead to benefits against this objective. Further, new shared houses should not give rise to unacceptable impacts on amenity, which could have some benefits against this objective.
		H8	+	S, M, L-T, I,	OPDC area	The policy seeks protect and maintain the existing site, providing certainty and stability for

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
				R, L	and surrounding boroughs	the community which may improve wellbeing. Any new sites could lead to the generation of additional health benefits for potential communities on new sites, as the policy requires that new sites are supported by appropriate facilities, layout and design quality to support health and wellbeing.
		H9	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support an identified housing need in London. A requirement to ensure that developments are of a high standard of design, and are accessible to public transport, shops, services, community facilities and social networks, should seek to also benefit this objective to some degree through a potential increase in walking to services and facilities, as well as reduction in air pollution, which could provide health benefits.
		H10	+	S, M, L-T, I, R, L	OPDC area and London-wide	The policy could lead to some benefits against this objective as it seeks to support student housing in accessible locations to public transport. However, the policy also seeks to ensure the new student housing does not have an unacceptable impact on residential amenity, which doesn't necessarily ensure the health and wellbeing of the student communities.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	H1	+	M, L-T, I, R, L	OPDC area	The policy will significantly increase the number of homes in the area. OPDC has considered the impact on school places and other social infrastructure and is working with partners to secure the additional provision required at the relevant stages of the redevelopment of the area.
		H2	0			There is no clear link between the policy and the IIA Objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	+	M, L-T, I, R, L	OPDC area	Family housing will be delivered close to appropriate social infrastructure such as schools.
		H5	+	M, L-T, I, R, L	OPDC area	Impacts on social infrastructure such as schools will be considered in determining whether to permit conversion of existing homes into two or more dwellings.
		H6	0			There is no clear link between the policy and the IIA Objective.
		H7	0			There is no clear link between the policy and the IIA Objective.
		H8	+	M, L-T, I, R, L	OPDC area	The policy requires that new gypsy and traveller site should be capable of support by local social infrastructure. This could include education facilities, leading to potential benefits against this objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
17	Maximise the	H1	+	M, L-T, I, R,	OPDC area	Old Oak and Park Royal Opportunity areas are major reservoirs of brownfield land with

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	social and economic wellbeing of the local and regional population and improve access to employment and training			L		significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Through this thousands of new employment opportunities will be created.
		H2	+	M, L-T, I, R, L	OPDC area	Delivery of affordable housing will ensure that people can afford to live and work in the OPDC area including those who provide emergency and other services that are essential to the effective running of mixed and balanced communities.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	+	M, L-T, I, R, L	OPDC area	This policy seeks to provide purpose-built PRS which can meet the housing needs of young professionals who want to move to the area for work and others who require employment mobility.
		H7	+	M, L-T, I, R, L	OPDC area	This policy seeks to provide shared accommodation which can meet the housing needs of young professionals who want to move to the area for work and others who require employment mobility. ~~There is no clear link between the policy and the IIA Objective.~~
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	0			There is no clear link between the policy and the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic	H1	+	L-T, I, R, L	OPDC area, London-wide and nationally	The policy seeks to provide a significant number of new homes in the area, which could increase the attractiveness of the area to inward investors wishing to locate in an area with high quality homes and facilities.
		H2	0			There is no clear link between the policy and the IIA Objective.
		H3	0			There is no clear link between the policy and the IIA Objective.
		H4	0			There is no clear link between the policy and the IIA Objective.
		H5	0			There is no clear link between the policy and the IIA Objective.
		H6	+	M, L-T, I, R, L	OPDC area, London-	By having housing which has been built for renting, this could attract a more mobile workforce and encourage inward investment for sustainable economic growth.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	growth				wide	
		H7	+	M, L-T, I, R, L	OPDC area, London-wide	Co-living schemes can support the sharing economy and play a role in meeting the housing needs of young professionals and those who require employment mobility.
		H8	0			There is no clear link between the policy and the IIA Objective.
		H9	0			There is no clear link between the policy and the IIA Objective.
		H10	+	M, L-T, I, R, L	OPDC area, London-wide	An increase in students in the area may attract local investment through the potential for a highly skilled and potentially flexible workforce.

Table D-7 Employment

E1: Protecting, strengthening and intensifying the Strategic Industrial Location ~~Protecting existing economic and employment functions~~
E2: Employment sites outside of Strategic Industrial Location ~~New B use class employment floorspace~~
E3: Supporting small businesses and start ups
E4: Work-live units
E5: Local access to training, employment and economic opportunities

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	E1	+	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect, strengthen and intensify land linked with industrial functions in the area. The area possesses a diverse economic profile and supporting ~~economic~~ industrial growth in areas within the Strategic Industrial Locations (SIL) would help to enhance the built environment and encourage place making.
		E2	+	S, M, L-T, I, R, M	OPDC area	The policy supports new employment outside of SIL and seeks to retain uses such as creative industries which can encourage place-making and enhance the built environment.
		E3	+	S, M, L-T, I, R, M	OPDC area	Supporting small businesses can encourage place-making and enhance the built environment by reflecting the needs of the community.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	+	S, M, L-T, I, R, L	OPDC area	An important focus of the policy is improving access to employment and training and it seeks to provide physical access to jobs for local people which would help the area become more defined and would contribute to placemaking.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	E1	+	S, M, L-T, I, R, M	OPDC area	The policy sets out to achieve no net loss of industrial floorspace maintaining and possibly increasing industrial building density which will have a positive effect against this objective.
		E2	+	S, M, L-T, I, R, M	OPDC area	The policy supports employment floorspace outside of SIL in appropriate locations and where this is an efficient use of land, thus scoring positively against this objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	E1	+	S, M, L-T, I, R, M	OPDC area	The policy protects existing strategic industrial locations so that it is available for reuse for these purposes which will have a positive effect against this objective.
		E2	+	S, M, L-T, I, R, M	OPDC area	The policy directs new employment space to appropriate locations, including previously developed land, which will have a positive effect against this objective. Although, if previously developed land is not suitable for the use or type of industry it may have to locate on greenfield land which could cause a negative impact on the Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	E1	+	M, L-T, I, R, L	OPDC area	The protection of strategic industrial functions would improve accessibility to jobs and help minimise the need for local people to travel to find work.
		E2	+	M, L-T, I, R, L	OPDC area	This policy seeks to support new employment space outside of SIL. By increasing employment space and job opportunities, it would improve accessibility to jobs and help minimise the need for local people to travel to find work.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	+	M, L-T, I, R, L	OPDC area	Combining spaces for work and living could contribute towards minimising contributions to climate change as it would reduce the need for travel.
		E5	+	M, L-T, I, R, L	OPDC area	The policy will require plans which help local people into work and local supply chains which should help minimise travel patterns.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	E1	0			The policy would not have any significant effects for the IIA Objective.
		E2	0			The policy would not have any significant effects for the IIA Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	E1	0			The policy would not have any significant effects for the IIA Objective.
		E2	0			The policy would not have any significant effects for the IIA Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	E1	+/-	M, L-T, I, R, M	OPDC area	The protection of SIL has the potential to impact upon climate change as it supports continued industrial activity. In the long term, it could contribute to effects upon natural resources and fossil fuels linked to industrial activities. However, this could be mitigated against with the inclusions of sustainable transport links~~,~~ economic growth could include more low carbon industries and ensure implementation of Local Plan policies related to environmental targets
		E2	+/-	M, L-T, I, R, M	OPDC area	By delivering new employment floor space outside of SIL, ~~this can have~~ a negative impact on climate change could~~-~~ be seen as an increase in economic growth has inherent impacts on natural resource/fossil fuel use. However, this economic growth could include more low carbon industries and the implementation of Local Plan policies related to environmental targets could help mitigate this impact.
		E3	0			There is no direct link between the policy and the IIA Objective.
		E4	+	M, L-T, I, R, L	OPDC area	Combining work and living spaces could contribute towards minimising contributions to climate change as it would reduce the need for travel.
		E5	+	M, L-T, I, R, L	OPDC area	The primary focus of the policy is to improve access to employment and skills for local people. Improved accessibility could contribute towards reducing journey times thus helping to minimise contributions to climate change.
8	To minimise	E1	~~+/-?~~	M, L-T, I, R, L	OPDC area	An increase in SIL could have implications for increased industrial waste generation as well as opportunities for waste facilities and recycling. This could

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
	production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste					be mitigated through building design and the implementation of ~~C~~circular e~~E~~conomy principles so the impact is uncertain.
		E2	+/-~~?~~	M, L-T, I, R, L	OPDC area	Increased employment floorspace outside of SIL could increase waste generation as well as opportunities for waste facilities and recycling This could be mitigated through building design and the implementation of ~~C~~circular ~~E~~economy principles so the impact is uncertain.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
9	Improve the quality of the water environment	E1	0			The policy would not have any significant effects for the IIA Objective.
		E2	0			The policy would not have any significant effects for the IIA Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	E1	0~~?~~	~~M, L-T, I, R, L~~	~~OPDC area~~	The policy would not have any significant effects for the IIA Objective.~~Policy seeks to protect and enhance SIL which could result in the loss of greenfield land and thus habitats having a negative impact on local biodiversity however, policies set out in the Environment and Utilities chapter could help mitigate this.~~
		E2	0~~?~~	~~M, L-T, I, R, L~~	~~OPDC area~~	The policy would not have any significant effects for the IIA Objective.~~Provision for new employment floorspace outside of SIL could result in the loss of greenfield land and thus habitats having a negative impact on local biodiversity however, policies set out in the Environment and Utilities chapter could help mitigate this.~~
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
11	To minimise air, noise	E1	+/-	M, L-T, I, R, H	OPDC area	The policy aims to protect and strengthen SIL, which accommodates uses that can be generate noise and contribute to poor air quality. The implementation of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
	and light pollution, particularly for vulnerable groups					policies in the Environment and Utilities chapter may help to mitigate potential impacts.
		E2	+/-	M, L-T, I, R, L	OPDC area	Increased employment sites outside of SIL has the potential to contribute to noise, air and light pollution. Careful design, the implementation of environmental policies and the incorporation of sustainable transport will help to mitigate these impacts.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	+	M, L-T, I, R, M	OPDC area	This policy aims to create work spaces located where people live which will have a positive impact on the ~~o~~Objective as it discourages travelling and large-scale developments.
		E5	+	M, L-T, I, R, M	OPDC area	By encouraging a local workforce, you can reduce need for travel, which will have an indirect impact on this.
12	To conserve and enhance the historic environment, heritage assets and their settings	E1	0			The policy would not have any significant effects for the IIA Objective.
		E2	0			The policy would not have any significant effects for the IIA Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	E1	+	M, L-T, I, R, M	OPDC area	The policy seeks to protect and strengthen SIL therefore retaining and potentially increasing local work opportunities which can encourage people to mix and promote community cohesion. Those that work and live in the local area can benefit from this policy.
		E2	+	M, L-T, I, R, M	OPDC area	Policy promotes employment sites outside of SIL and makes specific reference to the retention of uses such as creative industries to help establish identity and support community cohesion. This broad mix of industrial type activities can assist with establishing a sense of community.
		E3	+	M, L-T, I, R, M	OPDC area	This policy would support entrepreneurship and new businesses to start up, increasing the opportunities for people to participate in economic development of the area and helping to reduce social exclusion.
		E4	+/-	M, L-T, I, R, M	OPDC area	Combined living and working spaces could lead to people becoming reclusive

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
						which will have a negative impact against the objective. However, the policy seeks to address this issue by encouraging a multitude of different business types, spaces of interaction and active frontages.
		E5	+	S, M, L-T, I, R, L	OPDC area	The policy focus is on maximising access to employment, skills training, apprenticeships and pre-employment support and the opportunity to provide pathways to employment could indirectly support the IIA Objective by encouraging community cohesion and welfare.
14	Improve safety and reduce crime and the fear of crime	E1	0			The policy would not have any significant effects for the IIA Objective.
		E2	0			The policy would not have any significant effects for the IIA Objective.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	0			The policy would not have any significant effects for the IIA Objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	E1	+	S, M, L-T, I, R, L	OPDC area	The protection and strengthening of SIL would help maintain jobs in the area, which would help contribute towards maximising wellbeing.
		E2	+	S, M, L-T, I, R, L	OPDC area	Whilst an increase in employment sites outside of SIL would not directly relate to health, the provision of increased employment uses would ultimately deliver additional jobs which would help contribute towards maximising wellbeing.
		E3	+	S, M, L-T, I, R, L	OPDC area	Whilst delivery of a diverse economy by supporting small businesses would not directly relate to health, the provision of new employment space would ultimately secure jobs which would help contribute towards wellbeing.
		E4	+	S, M, L-T, I, R, L	OPDC area	The provision of work-live units would not directly relate to health but would ultimately create jobs and maximise wellbeing and could encourage a more appealing work and life balance.
		E5	+	S, M, L-T, I, R, L	OPDC area	Maximising access to employment and training could have a positive effect on the wellbeing of the population.
16	To improve the education and skills levels of all members	E1	?			The protection and strengthening of SIL could maintain and possibly enhance industrial training opportunities such as apprenticeships for young people, however the extent of these opportunities is unknown at this time.
		E2	?			Policy promotes employment sites outside of SIL which could potentially offer

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
	of the population, particularly vulnerable groups					enhanced industrial training opportunities such as apprenticeships for young people, however the extent of these opportunities is unknown at this time.
		E3	0			The policy would not have any significant effects for the IIA Objective.
		E4	0			The policy would not have any significant effects for the IIA Objective.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise access to skills training, apprenticeships, and pre-employment support all of which would contribute towards improving the skills level of the population.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	E1	+ +	S, M, L-T, I, R, M	OPDC area	The policy seeks to protect and strengthen SIL which would contribute partially towards achieving the IIA Objective by maintaining and potentially increasing access to industrial employment opportunities.
		E2	++	S, M, L-T, I, R, M	OPDC area	Policy promotes employment sites outside of SIL which would contribute partially towards achieving the IIA Objective through improved and increased access to employment.
		E3	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to deliver a diverse economy through supporting small local businesses which would contribute ~~partially~~ towards achieving the IIA Objective by maximising economic wellbeing through improved access to employment.
		E4	+	M, L-T, I, R, M	OPDC area	The policy seeks to support work-live spaces which could maximise economic wellbeing by creating new opportunities for employment, including self employment.
		E5	++	S, M, L-T, I, R, M	OPDC area	The policy seeks to maximise employment, skills training, apprenticeships, and pre-employment all of which would directly support the IIA Objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	E1	+ +	M, L-T, I, R, M	OPDC area and beyond	The policy seeks to protect and strengthen SIL including for a broad range of industrial types and activities including identified future growth sectors. This will also contribute to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.
		E2	+~~+~~	M, L-T, I, R, M	OPDC area and	Policy promotes employment sites outside of SIL including for a broad range of

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact (Direct/Indirect) Reversibility Certainty	Geographical Extent	Commentary and Recommendations
					beyond	industrial types, activities and including identified future growth sectors. This would help to encourage inward investment alongside investment within existing communities. This will also contribute to London's economic growth all of which would help to encourage inward investment alongside investment within existing communities.
		E3	+	M, L-T, I, R, M	OPDC area	The policy seeks to support small businesses. This will contribute to London's economic growth and help to encourage inward investment alongside investment within existing communities.
		E4	+	M, L-T, I, R, M	OPDC area	The policy would contribute ~~to support work-live units, contributing~~ to establishing and/or growing a new business sector that would positively contribute to the economic regeneration of the area.
		E5	+	M, L-T, I, R, M	OPDC area	The policy principally seeks to maximise access and investment in employment and training for local people. Access to a skilled pool of people could contribute towards attracting inward investment.

Table D-8 Town Centre and community uses

TCC1: Locations for and impacts of town centre uses
TCC2: Vibrancy
TCC3: A-class uses
TCC4: Social infrastructure
TCC5: Culture and Art
TCC6: Sports and Leisure
TCC7: Public Houses
TCC8: Catalyst Uses
TCC9: Meanwhile Uses
TCC10: Visitor Accommodation
TCC11: Night-time economy uses

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	TCC1	++	S,M,L-T, D, R, M	Town Centres	This policy aims to optimise development opportunities, ensures the development will reduce the need to travel by car, will not have an adverse effect on the operation on the road network. This policy focuses on town centre uses which play an important role in place-making by attracting people to the area and helping to enliven it.
		TCC2	++	S,M,L-T, D,R,H	Town Centres	Town centre uses play an important role in place-making, by attracting people to an area and helping to enliven it. Town centre uses within the OPDC area, particularly in Old Oak, will help to play a critical role in the approach to place-making. An important way of achieving this is through activating and overlooking the public realm, by providing outdoor uses such as event space, outdoor seating associated with eating and drinking establishments and through the provision of street markets.
		TCC3	0			Policy TCC3 aims to complement existing town centres. Town centres play an important role in place-making by attracting people and giving an area more of an 'atmosphere'. However, effects of this are considered negligible.
		TCC4	++	S,M,L-T, D, R, L	OPDC and surrounding area	This policy is focused upon social infrastructure. This may attract more visitors by protecting existing facilities and creating new ones. It is stated that new infrastructure will be highly accessible, health care facilities will have located nearby, education facilities can be easily accessed by foot and will be in close proximity to public open spaces. This policy also ensures there is a high quality of design in the new infrastructure which is essential for place-making.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TCC5	+	S,M,L-T, D,R,H	OPDC and surrounding area	The supporting text to the policy states that culture facilities can make an important contribution to place-making, can be important catalyst uses. They can help to define and shape the place and add to vibrancy and activity by attracting visitors to an area.
		TCC6	+	S,M,L-T, D,R,H	OPDC and surrounding area	The supporting text to the policy states that sports and leisure facilities can make an important contribution to place-making, can be important catalyst uses. The can help to define and shape the place and add to vibrancy and activity by attracting visitors to an area.
		TCC7	+	S,M,L-T,D,R,M	OPDC and surrounding area	Pubs can be important in place-making as they can add attract visitors into an area and are important in community life, thus scoring a positive for this objective.
		TCC8	+	S,M,L-T, D,R,M	OPDC and surrounding area	The criteria for catalyst uses require that facilities support place-making and identity.
		TCC9	++	S,M,L-T, D,R,H	Old Oak and Park Royal	The policy promotes positive contributions to the character and early activation of an area and reinforces longer term uses planned for the area. ~~states that '*Meanwhile uses are likely to play a huge role in early place-making in the OPDC area, particularly in Old Oak, where there will be many temporarily vacant land parcels awaiting development in the longer term.'*~~ This is important in particular as it can contribute positively to the character of an area which is important in place-making.
		TCC10	0			Visitor accommodation is an element that contributes to creating a place. The policy highlights the importance of hotels for leisure and business that could help the tourism sector in the area. However, positive effects of this policy are considered negligible.
		TCC11	++	S,M,L-T, D,R,M	OPDC and surrounding area	Night-time economy uses play an important role in place-making, by attracting people to an area and helping to enliven it. Eating and drinking establishments and culture, sports and entertainment uses should create a sense of place for residents and visitors to the area. Limits have been imposed to ensure activity is kept within sensible hours.
2	To optimise the efficient use of land through increased development	TCC1	+	S,M,L-T, D,R,M	Town Centres	This policy supports efficient use of land through focusing town centre development in town centres. The policy will only support development outside town centres when development is located within identified clusters.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	+	S,M,L-T, D,	Town Centres	This policy aims to provide new developments which aim to provide vital use and services

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	densities and building heights, where appropriate			R, M		to members of the public, thus optimising efficient land use.
		TCC4	+	S,M,L-T, I,R,H	OPDC area	By delivering social infrastructure, this would support the efficient use of land. The policy aims to collocate facilities where feasible and in close proximity to town centres. This can ensure the land is more efficiently allocated for other needs.
		TCC5	+	S,M,L-T, I,R,L	OPDC area	By protecting existing culture facilities, this would support the efficient use of land. New facilities will be in town centres which can release land for other needs
		TCC6	+	S,M,L-T, I,R,L	OPDC area	Protecting existing sports and leisure facilities would support the efficient use of land. This can indirectly ensure that other land can be set aside for other needs within local plan.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	++	S,M,L-T, I,R,L	OPDC area and London wide	The policy for meanwhile uses seeks to make practical use of land which would otherwise remain vacant until redeveloped. This policy therefore supports an optimised approach to the use of land
		TCC10	+	S,M,L-T, I,R,L	OPDC area and London wide	The preferred policy option to deliver visitor accommodation would support the efficient use of land as it is focused within town centre locations.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
3	Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	TCC1	+	S,M,L-T, D, R, M	Town Centres	Town Centres are all located on previously developed land which will score positively against this IIA Objective.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	0			The policy would not have any significant effects for the IIA Objective.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	++	S,M,L-T, I,R,L	OPDC area and London wide	Any new development within the town centre would be built on brownfield sites on a large scale.
		TCC9	+	S,M,L-T, I,R,L	OPDC area and London wide	This policy states that *'there will be many temporarily vacant land parcels awaiting development in the longer term*.'

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TCC10	+	S,M,L-T, I,R,L	OPDC area	The preferred policy option to deliver visitor accommodation would support the maximum reuse of brownfield land.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	TCC1	+	L-T, I, R, M	Town Centres	This policy states that developments which will reduce the need to travel by car will be supported
		TCC2	+	L-T, I, R, L	OPDC area	The policy seeks to deliver a range of land uses and associated town centre infrastructure. This could help to reduce the need to travel for both existing and incoming communities, which could have long term benefits against this objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	+	M, L-T, I, R, L	OPDC area	The policy ensures educational facilities can be easily accessible by foot or by public transport. It also ensures development is in highly accessible and that health care and community facilities are in close proximity to town centres. This will have a positive impact on the transport objective.
		TCC5	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.
		TCC6	+	M-T, D,R,M	OPDC area	The policy clarifies that OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.
		TCC7	+	S,M,L-T,D,R,M	OPDC and surrounding area	The policy aims to ensure licensed premises are within close proximately to public houses which could minimise the need to travel.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	+	S,M,L-T, I,R,L	OPDC area and London wide	The policy refers to not having an unacceptable impact on transport. This could indirectly minimise the need to travel as it ensures existing transport is not negatively affected.
		TCC10	++	S,M,L-T,D,R,M	OPDC and surrounding area	The policy states that hotels are well suited to areas of high public transport access and therefore, parts of the OPDC area and particularly the Old Oak area would be appropriate locations to consider promoting visitor accommodation.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
5	Improve access	TCC1	0			The policy would not have any significant effects for the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	0			The policy would not have any significant effects for the IIA Objective.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+			The policy requires 10% of hotel bedrooms to be wheelchair accessible, supporting the need for inclusive housing. Policy also ensures that provision for visitor accommodation does not compromise the delivery of housing targets.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
6	Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	0			The policy would not have any significant effects for the IIA Objective.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TC6	0			The policy would not have any significant effects for the IIA Objective.
		TC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance	TCC1	+	L-T, I, IR, L	OPDC and surrounding area	This policy supports development in town centres that aims to reduce the use of cars which would have a positive effect on climate change as less cars on the road may result in less greenhouse gas emissions.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	+	L-T, I, IR, L	OPDC and surrounding area	This policy aims to increase the public transport and increase areas which are accessible by food or cycle. This in turn may reduce the use of cars which may have a positive effect on climate change as less cars on the road may result in less green-house gas emissions.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	on natural resources including fossil fuels for transport, heating and energy	TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as composting of all green waste	TCC1	?			The policy will not directly contribute to benefits against this objective. However, by focusing development in town centres, it could benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TCC2	?			The policy will not directly contribute to benefits against this objective. However, the emphasis on high quality design should contribute in ensuring that sufficient space is given to waste collection and aim to minimise transporting waste.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	?			The policy will not directly contribute to benefits against this objective. However, by focusing development near town centres, it can benefit construction and operational waste collection and the provision of recycling facilities through spatial proximity.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
9	Improve the quality of the water environment	TCC1	?			The policy would not have any significant effects on the IIA Objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC2	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC3	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						development ahead of occupation.
		TCC4	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC5	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC6	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC7	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC8	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC9	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC10	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
		TCC11	?			The policy would not have any significant effects for the objective. Any development would need to ensure that water infrastructure capacity is sufficient to accommodate new development ahead of occupation.
10	Create and enhance biodiversity and the diversity of habitats across the area and its	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	0			The policy would not have any significant effects for the IIA Objective.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	surroundings	TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	TCC1	+/-	S,M,L-T, I,R,L	Town Centres	By focussing development within town centres will encourage people to use sustainable public transport which will help to reduce noise and air pollution. However, more development within town centres will encourage more visiting to the city which could cause an increase in the number of cars in the area. Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TCC2	?			Minimisation of air, noise and light pollution caused by traffic and commercial uses during the construction and operation of development on existing town centres and communities should help maintain the vibrancy of the area but this is not explicitly referred to.
		TCC3	?			Minimisation of air, noise and light pollution caused by traffic and commercial uses during the construction and operation of development on existing town centres and communities should help maintain the vibrancy of the area but this is not explicitly referred to.
		TCC4	+/-	S,M,L-T, I,R,L	Town Centres	By focussing town centre development within town centres may encourage people to use sustainable public transport which may help to reduce noise and air pollution. However, more development within town centres may encourage more visiting to the city which could cause an increase in the number of cars in the area. Impacts on air, noise and light pollution generated by town centre uses will need to be managed by London Plan policy and policies in the Environment and Utilities Chapter.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	0			The policy would not have any significant effects for the IIA Objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+/-	S, M, L-T, I, IR, L	OPDC area and surrounding boroughs	Greater volumes of tourists to the area may result in higher amounts of vehicular transport and resultant air pollution if the area is not supported by appropriate public transport infrastructure. However, the policy states that it will not give rise to unacceptable impacts on the transport network.
		TCC11	+	S, M, L-T, I, IR, L	OPDC area	The policy states that proposals for late licenses will be assessed in terms of the uses impact on residential amenity. It will consider issues such as noise within the premises,

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						smells, light pollution and the impact of those going to and from the facility It considers issues such as traffic and car parking and anti-social behaviour. As such this would benefit the objective.
12	To conserve and enhance the historic environment, heritage assets and their settings	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	+	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	The policy could lead to the preservation of the historic environment through a focus on creating an attractive, locally distinctive, vibrant town centre. Regeneration and intensification must recognise the importance of heritage and historic environment as referred to in Policy D8.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New social infrastructure development, in particular in areas in close proximity to heritage assets, could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D8 and London Plan policy.
		TCC5	0			The policy would not have any significant effects for the IIA Objective.
		TCC6	0			The policy would not have any significant effects for the IIA Objective.
		TCC7	++			The policy looks to protect public houses. All three public houses within the OPDC area are currently identified as being appropriate to be locally listed. This policy therefore scores positively against this objective.
		TCC8	+/-	S, M, L-T, D, IR, L	OPDC area and surrounding boroughs	New town centre development could lead to benefits, through the potential for improving the setting of the historic environment, as well as improving the assets themselves through re-use. Development in Old Oak and Park Royal could also have a detrimental effect on any existing heritage assets unless adequately managed by Policy D8 and London Plan policy.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+/-	S, M, L-T, I, R, M	OPDC and London wide	The policy could lead to the preservation of the historic environment but the potential design of proposals may have a detrimental effect on the character of the area if not adequately managed by design policies within the Design Chapter and London Plan.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
13	Increase community cohesion and	TCC1	+	S,M,L-T, D,R,M	Town Centres	This policy supports the role and function of OPDC's designated town centres and town centres uses. Town centres play a vital role in community cohesion and encourage a sense of community and welfare.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	reduce social exclusion to encourage a sense of community and welfare	TCC2	++	M, L-T, D, R, M	OPDC area and London wide	Vibrant town centre uses, regeneration links with London and a healthy mix of retailers in the area should benefit the community cohesion through entertainment, employment and social infrastructure.
		TCC3	+	S,M,L-T, D,R,M	OPDC area	A-class uses aims to complement existing town centres and ensures that it provides vital services including banks and restaurants which will support the local community needs. This will benefit community cohesion, reduce social exclusion, and encourage a sense of community and welfare.
		TCC4	++	S,M,L-T, D,R,L	OPDC area	By proving new social infrastructure provisions and protecting and enhancing existing ones this will have a major positive impact on this objective.
		TCC5	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC aims to support high quality culture in the area. This should improve community cohesion and reduce social exclusion.
		TCC6	+	S,M,L-T, D,R,H	OPDC area	The policy states that OPDC is keen to ensure that there is access to all new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision. This should improve community cohesion and reduce social exclusion.
		TCC7	+/-	S,M,L-T, ID,R,M	OPDC area	The use of pubs encourages social activity which will have positive effect on social aspects and encourages a sense of community and welfare. However, use of alcohol can lead to anti-social behaviour which will have a negative impact on this objective.
		TCC8	++	S,M,L-T, D,R,H	Nationwide	Catalyst uses which satisfy the criteria in the policy would provide access to facilities to meet needs and support the integration of existing and new communities in the area.
		TCC9	+	M,L-T, D,R, M	Nationwide	This policy aims to provide the opportunity for place-making which in turn will improve cohesion.
		TCC10	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation will improve the tourism sector in the area, thereby, improving the local economy with community benefits. A more prosperous local economy should create more community cohesion.
		TCC11	+	S,M,L-T, D,R,H	OPDC area	Night time entertainment should play an important role in the vibrancy of the area, thereby, improving community cohesion and adding activity to the public realm and supporting the local economy. This is supported as the policy seeks to impose sensible limits on hours.
14	Improve safety and reduce crime and the	TCC1	+/-	S.M. L-T, R, ID, M	Town Centres	Careful design of development can help to discourage anti-social behaviour. However, new development can also attract more criminal activity as there will be more areas for criminals to target.
		TCC2	+	M, L-T, I, R, L	London wide	The optimisation of development in the town centres, including facility security and

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	fear of crime					strategic infrastructure that could improve traffic management, could lead to benefits against this objective through improved safety.
		TCC3	+	S.M. L-T, R, ID, M	OPDC area	By improving vital services and the needs of communities this could reduce crime as it promotes local business and social things for people to do.
		TCC4	+	S.M. L-T, R, ID, M	OPDC area	This policy aims to improve the design of the area which can discourage anti-social activity. It also provides infrastructure for social facility and community facilities. A large community can be off putting to criminals. It also creates more activities for people.
		TCC5	+/-	S.M. L-T, R, ID, L	OPDC area	High quality design of culture and art may attract criminal activity. However, due to high quality design, there should be high level security provided to increase safety of others and to discourage criminal activity,
		TCC6	+	M, L-T, I, R, M	London wide	A new leisure facility should provide high level security and natural surveillance to increase the safety of the users.
		TCC7	-	S,M,L-T, I,R,M	OPDC area	Drinking activity in pubs can be associated with anti-social behaviour such as fighting. However, policy TCC11 aims to ensure that licensing of premises is appropriately managed to mitigate any negative impacts.
		TCC8	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it will also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TCC9	+/-	S,M,L-T, I,R,M	OPDC and surrounding area	Supporting the area with new cultural destinations and town centres should enhance security and surveillance in the area. However, it may also create more opportunity for crime if not adequately managed through London Plan policy and other mechanisms.
		TCC10	?			Visitor accommodation should provide high level security and natural surveillance to increase the safety of their guests. The accommodation will attract more visitors with uncertain effects on crime.
		TCC11	+	S,M,L-T, I,R,L	OPDC area	Security is an important aspect of night-time uses. The safety and wellbeing of local residents and users at drinking establishments must have high security and surveillance in place during and after operating hours. Imposing appropriate hours for trade may help prevent crime
15	Maximise the health and wellbeing of the population, reduce	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	+	S, M, L-T, D, R, H	London wide	The policy seeks to realise benefits for health and well-being, by limiting takeaways in certain locations near schools and the volume of betting/payday loan shops/games arcades and pawn shops.as such, this would have a positive benefit against the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	inequalities in health and promote healthy living	TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	++	S,M,L-T, I,R,M	OPDC area	The policy seeks to provide appropriate health facilities to meet the needs of development. The policy therefore scores positively against this objective.
		TCC5	0	S, M, L-T, D, R, H	OPDC and London wide	The policy would not have any significant effects for the IIA Objective.
		TCC6	++	S, M, L-T, D, R, H	OPDC and London wide	Sports and leisure facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. This will be especially important for access to sports facilities. There is a direct correlation between income deprivation and obesity and as a healthy new London quarter, OPDC is keen to ensure that there is access for all to new sports facilities for local communities and OPDC will seek to secure a proportion of affordable sports and leisure provision.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	+	S,M,L-T, I,R,M	OPDC area	The policy supports the provision of new sports facilities, subject to the criteria being satisfied.
		TCC9	+	S,M,L-T, I,R,M	OPDC area	The policy makes it clear that OPDC will support proposals which do not have a negative impact on residential amenity.
		TCC10	0			The policy would not have any significant effects for the IIA Objective.
		TCC11	+	S, M, L-T, I, R, M	OPDC area	Seeking to manage the hours of operation of evening and night time economy uses would help to manage the impact on building user amenity and users' health and well-being.
16	To improve the education and skills levels of all members of the population, particularly vulnerable groups	TCC1	0			The policy would not have any significant effects for the IIA Objective.
		TCC2	0			The policy would not have any significant effects for the IIA Objective.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	++	S.M.L-T, D, R, M	OPDC area	This policy aims to build new education facilities which has a major positive against this objective.
		TCC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural facilities will help to generate new job and skills development opportunities that will benefit local people.
		TCC6	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new sports and leisure facilities

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
						will help to generate new job and skills development opportunities that will benefit local people.
		TCC7	0			The policy would not have any significant effects for the IIA Objective.
		TCC8	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	New education facilities would contribute to the achievement of benefits against this objective.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TCC11	0			The policy would not have any significant effects for the IIA Objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	TCC1	++	S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services, and adding vibrancy and activity. To support these centres, employment and residential uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. New town centre uses will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors. The requirement for Town Centre Uses Statements and the Harlesden District Centre will also support the economic vitality and viability of surrounding town centres.
		TCC2	+	S,M,L-T,I,R,M	OPDC area	The policy promotes vibrancy that can attract inward investment which is a positive for socio-economic wellbeing.
		TCC3	0			The policy would not have any significant effects for the IIA Objective.
		TCC4	++	S,M,L-T, D,R,L	OPDC area	This policy ~~states the '*OPDC will seek to secure a range of high quality social infrastructure facilities for existing and new residents and workers.*'~~seeks to protect existing social infrastructure facilities through ensuring no net loss occurs and supports proposals for new and improved community facilities where possible. ~~Which~~This will score a major positive against this objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
		TCC5	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new cultural facilities will help to generate new job and skills development opportunities that will benefit local people.
		TCC6	++	S, M, L-T, D, R, H	London wide	The Mayor's Cultural Strategy promotes London as the world's cultural capital and this role can help widen the reach of access to culture, support education skills and careers and enhance the physical environment. The delivery of new sports and leisure facilities will help to generate new job and skills development opportunities that will benefit local people.
		TCC7	+	S,M,L-T, D,R,M	OPDC area	Enhancing pubs and create new public houses will create areas for people to meet and drink socially which will score positively against this objective.
		TCC8	++	S,M,L-T, I,R,M	OPDC area	Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity. To support these centres, catalyst uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality. Catalyst uses that satisfy the criteria in the policy will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors.
		TCC9	0			The policy would not have any significant effects for the IIA Objective.
		TCC10	+	S, M, L-T, I, R, L	OPDC area and surrounding boroughs.	The delivery of new visitor accommodation will help to generate new job and skills development opportunities that will benefit local people.
		TCC11	+/-	S,M,L-T, I,R,M	OPDC area	Operational hours may influence employment resource required at the venues. A new facility could create employment opportunities for the local people. The policy also ensures proposals would not result in harmful cumulative impacts in association with other late licensed properties leading to loss of employment.
18	To encourage inward investment alongside	TCC1	+	S, M, L-T, I, R, M	Town Centres	Town centres tend to have the most businesses. By focusing development in town centres, this will encourage sustainable economic growth. Also, by focusing development in town centres, it will encourage more sustainable transport methods.
		TCC2	+	M, L-T, I, R, L	OPDC area	The policy could lead to indirect positive effects against this objective, as an improvement

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	investment within existing communities, to create sustainable economic growth				and London wide	to the aesthetics and vibrancy could improve the attractiveness of the town centres to inward investors.
		TCC3	+	S, M, L-T, I, R, M	Town Centres	More facilities may provide inward investment and community benefits for the area.
		TCC5	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TCC6	+	S,M,L-T, D,R,M	OPDC and surrounding areas	More facilities may provide inward investment and community benefits for the area.
		TCC7	+	S, M, L-T, I, R, M	OPDC area	More facilities may provide inward investment and community benefits for the area.
		TCC8	++	S,M,L-T, I,R,M	London wide	The policy emphasises London's growing needs and the role that these town centre facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.
		TCC9	+	S,M,L-T, I,R,M	London wide	More facilities may provide inward investment and community benefits for the area.
		TCC10	+	S,M,L-T, D,R,H	OPDC and surrounding area	More high quality visitor accommodation businesses will attract investment into the area which help create and build sustainable economic growth in the OPDC and surrounding area.
		TCC11	++	S,M,L-T, D,R,H	OPDC and surrounding area	The policy supports the role that eating and drinking establishments and culture, sports and leisure uses can play in contributing to the vibrancy and vitality of the OPDC area. This will add activity to the public realm and supporting the local economy. The operating hours should benefit the local community and develop economic growth in the area.

Table D- 9 Delivery and Implementation

- DI1: Balancing priorities and securing infrastructure delivery
- DI2: Timely delivery and optimised phasing
- DI3: Stakeholder engagement and being a proactive planning authority
- DI4: Planning powers and monitoring

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
1	To enhance the built environment and encourage 'place-making'	DI1	+	S,M,L-T, R, D, L	OPDC area	By funding and financing infrastructure, it can optimise development opportunities and enhance local distinctiveness and character which is important in place making.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, comprehensive delivery of a high quality place is more likely.
		DI3	+	S,M,L-T, R, D, L	OPDC area	By supporting community involvement in the planning and delivery of development, it can play an important role in place making as can assist in reflecting the needs of the community.
		DI4	++	S,M,L-T, R, D, L	OPDC area	By utilising planning powers, including plan making, a high quality place is more likely to be delivered.
2	To optimise the efficient use of land through increased development densities and building heights, where appropriate	DI1	+	S,M,L-T, R, D, L	OPDC area	The policy seeks to balance the priorities between housing, infrastructure and sustainability and to do so in light of an optimised approach to development throughout the OPDC area. This could help ensure the efficient use of land.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, achieving higher densities could be more likely compared to a piecemeal approach.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	+	S,M,L-T, R, D, L	OPDC area	Using the broad range of planning functions will likely support the optimum use of land by coordinating delivery.
3	Maximise the reuse of previously developed land and existing buildings, including the	DI1	0			The policy would not have any significant effects for the objective.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, the efficient use of previously development land is more likely.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	+	S,M,L-T, R, D, L	OPDC area	Utilising planning powers will likely deliver efficiencies in the reuse of previously development land through a coordinated approach.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	remediation of contaminated land					
4	Minimise the need to travel, improve accessibility for all users by public and non-motorised transportation methods and mitigate impacts on the transport network	DI1	+	S,M,L-T, R, D, L	OPDC area	The main element of the policy and the delivery of infrastructure within OPDC relates to transport links, therefore a co-ordinated approach to this should score positively against this objective.
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	0			The policy would not have any significant effects for the objective.
5	Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	DI1	+	S,M,L-T, R, D, L	OPDC area	This policy aims to secure the delivery of infrastructure. Careful design of the infrastructure may have a positive effect against this objective
		DI2	+			By supporting coordinated delivery of development, a comprehensive approach to delivering affordable housing could be achieved, thereby potentially increasing delivery.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	+	S,M,L-T, R, D, L	OPDC area	By using the full range of planning powers, a comprehensive approach to delivering affordable housing could be achieved, thereby potentially increasing delivery.
6	Improve climate change adaptation and mitigation, including minimising the	DI1	+	S,M,L-T, R, D, L	OPDC area	The policy seeks to ensure that infrastructure provision, amongst which open space and street greening are discussed, is required for the sustainable development of the area.
		DI2	+			By supporting coordinated delivery of development, a strategic approach for larger areas could result in the delivery of more effective infrastructure to adapt and mitigate climate change.
		DI3	+	S,M,L-T, I, IR,	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	risk of flooding and addressing the heat island effect			L		be learnt on development across the area. *The supporting text can be strengthened in order to ensure that climate change is mentioned in terms of resilience.*
		DI4	0			The policy would not have any significant effects for the objective.
7	To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	DI1	+	S,M,L-T, I, IR, L	OPDC area	The policy secures infrastructure which makes the development acceptable in accordance with the policies in the Local Plan, which aim to promote sustainable transport measures and high standards of environmental sustainability and minimising contributions to climate. In the round, this therefore scores positively.
		DI2	0			By supporting coordinated delivery of development, a strategic approach for decentralised energy generation and storage could be achieved.
		DI3	+	S,M,L-T, I, IR, L	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can be learnt on development across the area. *The supporting text can be strengthened in order to ensure that climate change is mentioned in terms of resilience.*
		DI4	0			The policy would not have any significant effects for the objective.
8	To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and	DI1	+	S,M,L-T, I, R, L	OPDC area	Infrastructure provision includes waste infrastructure. *The supporting text can be strengthened in order to ensure that waste infrastructure is considered.*
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	+	S,M,L-T, I, R, L	OPDC area	The post occupancy survey referenced in the policy is aimed at ensuring that lessons can be learnt on development across the area. *The supporting text can be strengthened in order to ensure that waste management is mentioned in terms of resilience.*
		DI4	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	recovery rates as well as composting of all green waste					
9	Improve the quality of the water environment	DI1	+	S,M,L-T, IR, I, L	OPDC area	The policy secures infrastructure which makes the development acceptable in accordance with the policies in the Local Plan, which aim to promote sustainable transport measures and high standards of environmental sustainability and minimising contributions to climate.
		DI2	+	S,M,L-T, IR, I, L	OPDC area	By supporting coordinated delivery of development, a strategic approach for water infrastructure could be achieved that is more effective in improving water quality.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	0			The policy would not have any significant effects for the objective.
10	Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	DI1	+	S,M,L-T, R, D, L	OPDC area	New infrastructure provision includes open space and securing contributions towards that will be beneficial.
		DI2	+	S,M,L-T, R, D, L	OPDC area	By supporting coordinated delivery of development, an integrated network of green infrastructure is more likely to be effective. It is paramount that the green infrastructure provisions considers biodiversity and not merely amenity.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	0			The policy would not have any significant effects for the objective.
11	To minimise air, noise and light pollution, particularly for vulnerable groups	DI1	+	S,M,L-T, R, I, L	OPDC area	The policy aims to secure funding and commitment in terms of new infrastructure provision which can secure sustainable transport modes and thereby minimise air and noise pollution.
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	0			The policy would not have any significant effects for the objective.
12	To conserve and enhance the historic environment, heritage assets	DI1	0			The policy would not have any significant effects for the objective.
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	0			The policy would not have any significant effects for the objective.
		DI4	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	and their settings					
13	Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare	DI1	+	S,M,L-T, R, D, M	OPDC area	Infrastructure provision includes social and community facilities hence a positive impact can be expected.
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	++	S,M,L-T, R, D, L	OPDC area	This policy aims to support community involvement in the planning and delivery of development which will improve the quality of the public realm and create social linkages with surrounding communities.
		DI4	0			The policy would not have any significant effects for the objective.
14	Improve safety and reduce crime and the fear of crime	DI1	+	S,M,L-T, R, D, L	OPDC area	Infrastructure provision includes policing infrastructure. *The supporting text can be amended to reflect this element.*
		DI2	0			The policy would not have any significant effects for the objective.
		DI3	+	S,M,L-T, R, I, M	OPDC area	By supporting community involvement this can help reduce social exclusion which in turn will improve safety and reduce the fear of crime.
		DI4	0			The policy would not have any significant effects for the objective.
15	Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	DI1	+	S,M,L-T, R, D, L	OPDC area	Infrastructure provision includes health facilities. *The supporting text can be amended to reflect this element.*
		DI2	+	S,M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to support health and equalities of the area.
		DI3	+	S,M,L-T, R, D, L	OPDC area	Community participation may help to maximise the health and wellbeing of the population by encouraging community cohesion.
		DI4	0			The policy would not have any significant effects for the objective.
16	To improve the education and skills levels of all members of the population, particularly	DI1	+	S,M,L-T, R, D, L	OPDC area	The supporting text in the policy talks about contributions for schools and employment and training opportunities which will have a positive impact against the policy.
		DI2	+	S,M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to improve education and skills levels through education and training facilities.
		DI3	0			The policy would not have any significant effects for the objective.

IIA Objective		Performance of Policy		Temporal Scale Nature of Impact	Geographical Extent	Commentary and Recommendations
	vulnerable groups	DI4	0			The policy would not have any significant effects for the objective.
17	Maximise the social and economic wellbeing of the local and regional population and improve access to employment and training	DI1	+	M,L-T, R, D, L	OPDC area	The supporting text in the policy talks about contributions for employment and training opportunities which will help to maximise the social and economic wellbeing of the local population.
		DI2	+	M,L-T, R, D, L	OPDC area	Securing the timely delivery of infrastructure required to support the needs of development will help to improve education and skills levels through education and training facilities.
		DI3	+	M,L-T, R, D, M	OPDC area	By engaging with the community and their needs, this can help maximise social and economic wellbeing of the local and regional population.
		DI4	0			The policy would not have any significant effects for the objective.
18	To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	DI1	+	M,L-T, R, D, L	OPDC area	New development will create jobs during and after construction. This will encourage inward investment. The policy also implies that states the majority of infrastructure will be met through on-site enablement rather than off-site provision, thus increasing inward longer term investment.
		DI2	+	S,M,L-T, R, D, M	OPDC area	By seeking to deliver development in a coordinated phased manner, a higher quality place is more likely to be delivered which will encourage inward investment alongside investment within existing communities.
		DI3	+	S,M,L-T, R, D, L	OPDC area	The policy refers to neighbourhood planning and working with communities which will encourage inward investment alongside investment within existing communities.
		DI4	+			By using the full range of planning powers, a higher quality place is more likely to be delivered which will encourage inward investment alongside investment within existing communities.

APPENDIX E

Strategic Options Assessment

Table E-1 – Affordable Housing Approaches

Draft IIA Objective (see Table 6-1 of IIA Report)	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
1. To enhance the built environment and encourage 'place-making'	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
2. To optimise the efficient use of land through increased development densities and building heights, where appropriate	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
3. Maximise the reuse of previously developed land and existing buildings, including the remediation of contaminated land	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
4. Minimise the need to travel and improve accessibility for all users by public and non-motorised transportation methods	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
5. Improve access to well designed, well-located, market, affordable and inclusive housing of a range of types and tenures, to meet identified local needs	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to ensure that mixed communities and a sense of place is achieved.	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas.	-	A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. Without an initial target, negotiated levels of provision could be low. A site specific approach approach could, alternatively, lead to the provision of an increase in market housing

Draft IIA Objective (see Table 6-1 of IIA Report)	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
		However, should this mean that fewer sites are developed, negative effects may result.				A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.		overall, which could reduce the significance of negative effects against this objective.
6. Improve climate change adaptation and mitigation, including minimising the risk of flooding and addressing the heat island effect	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
7. To minimise contributions to climate change through greater energy efficiency, generation and storage; and to reduce reliance on natural resources including fossil fuels for transport, heating and energy	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
8. To minimise production of waste across all sectors in the plan area, maximise efficiencies for transporting waste and increasing rates of re-use, recycling and recovery rates as well as	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.

Draft IIA Objective (see Table 6-1 of IIA Report)	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
composting of all green waste								
9. Improve the quality of the water environment	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
10. Create and enhance biodiversity and the diversity of habitats across the area and its surroundings	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
11. To minimise air, noise and light pollution, particularly for vulnerable groups	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
12. To conserve and, where appropriate, enhance, cultural heritage	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
13. Increase community cohesion and reduce social exclusion	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion. However, should this mean that fewer sites are developed, negative effects may result.	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore some communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas. A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability	--	A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion in relation to access to affordable housing.

Draft IIA Objective (see Table 6-1 of IIA Report)	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
						issues. Therefore, a mix of both positive and negative effects is predicted.		
14. Improve safety and reduce crime and the fear of crime	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion and subsequently reduce levels of crime and anti-social behaviour. However, should this mean that fewer sites are developed, negative effects may result.	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area and subsequently reduce levels of crime and anti-social behaviour.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas. A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.	--	A site specific approach could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, which could have knock on effects for anti-social behaviour. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent levels of crime/fear of crime.
15. Maximise the health and wellbeing of the population, reduce inequalities in health and promote healthy living	+/-	The approach could help to create a 'level playing field' across the area, which could enable the delivery of affordable housing. This could help to ensure that all areas are 'equal' in terms of provision, which could help distribute affordable housing more evenly across the plan area. This could help to reduce social exclusion and subsequently improve human health. However, should this mean that fewer sites are developed, this could lead to negative effects.	-	The product dependent range could lead to inequalities across the plan area, as some housing 'types', and therefore types of communities, may be seen as more 'suitable' for higher affordable housing provision than others. This could lead to negative effects against this objective as it may create inequalities and increase social exclusion across the area. This could have negative effects for health in certain areas.	+/-	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, increasing social exclusion. This approach, however, would include an initial target percentage, which could help negotiations, although it is unclear whether this target percentage would be an all-area percentage or based on different products or areas. A viability-based approach could, alternatively, help to deliver more affordable housing as, should a fixed percentage be required, developers may not develop certain sites due to viability issues. Therefore, a mix of both positive and negative effects is predicted.	--	A viability based percentage could reduce the provision of affordable housing in areas where land values are the lowest. This could, therefore, create an imbalance in provision across the plan area, potentially reducing provision in areas of greatest need, which could have knock on effects for health. Without an initial target, negotiated levels of provision could be low. This could increase levels of social exclusion and subsequent knock-on effects for health.

Draft IIA Objective (see Table 6-1 of IIA Report)	Approach 1 – (Single) Fixed contribution across OPDC area		Approach 2 – Product dependent range		Approach 3 – Viability based percentage		Approach 4 – Negotiate a target on site specific basis	
	Impact	Commentary	Impact	Commentary	Impact	Commentary	Impact	Commentary
16. To improve the education and skills levels of all members of the population, particularly vulnerable groups	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
17. Maximise the social and economic wellbeing of the population and improve access to employment and training	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.
18. To encourage inward investment alongside investment within existing communities, to create sustainable economic growth	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.	0	How affordable housing is delivered is not directly relevant to this objective.

APPENDIX F SEA Regulations Compliance Checklist

SEA Regulations Requirement		Where Found in this IIA Report
Regulation		
12-(2)	The report shall identify, describe and evaluate the likely significant effects on the environment of—	
	(a) implementing the plan or programme; and	Chapter 6 – allocations Chapter 9 – policies Appendix D, G
	(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.	Chapter 6 – allocation alternatives Chapter 8 – policy alternatives Appendix D
12-(3)	The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required	
Information referred to in Schedule 2, as required through Regulation 12-(3)		
1.	An outline of the contents and main objectives of the plan or programme and of its relationship with other relevant plans and programmes.	Chapter 2 – objectives and contents of the plan Chapter 2 – relationship with the London Plan, etc. Chapter 4, Section 4.1 – review of PPPSIs
2.	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 4, Section 4.2 – baseline summary Chapter 4, Section 4.3 – key environmental issues / problems
3.	The environmental characteristics of areas likely to be significantly affected.	
4.	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.	
5.	The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 4, Section 4.1 – review of PPPSIs
6.	The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—	Chapter 6 – allocations Chapter 9 – policies

SEA Regulations Requirement			Where Found in this IIA Report
	(a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air;	(i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Chapter 10 – cumulative effects
7.	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.		Chapter 6, Appendix D – allocations Chapter 9 – policies
8.	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		Chapter 2, Section 8.1, 8.2 – origins of the alternatives dealt with Chapter 3 – approach and method, including difficulties Appendix F
9.	A description of the measures envisaged concerning monitoring in accordance with regulation 17[1].		Chapter 11
10.	A non-technical summary of the information provided under paragraphs 1 to 9.		Refer to the Non-Technical Summary

[1] "The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" (Regulation 17-(1)).

SEA Compliance Policy Recommendations

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
Strategic Policies				
Places	Reg 18: IIA objective 1, P3 - It is suggested that further clarity with regards to green infrastructure is provided strategically, to which the requirement within the policy could refer to. It is also recommended that it is referred to as 'multifunctional green infrastructure' as, although SuDS are referred to in the supporting text, green infrastructure has the potential to provide greater benefits. IIA objective 1, P4 - It is recommended that clarity is provided in the supporting text as to the nature of 'new and enhanced green and civic spaces' as required through the policy wording in relation to green infrastructure, and what their functions are intended to be. IIA objective 4, P1 - It is suggested that the 'delivery' and 'transport' sections of the policy repeat the supporting of transport infrastructure. These two sections could be merged, to avoid repetition. It is also suggested that the 'streets' section (o) repeats the need for the new transport infrastructure to integrate with its surroundings. These two sections could be streamlined to avoid repetition. IIA objective 4, P7 - It is suggested that the proposed 'connections' across the A40 are explained more clearly in the policy text. IIA objective 4, P10 - The policy wording could specify that promoted access to Wormwood Scrubs would be via walking and cycling modes, as set out in the supporting text to the policy. IIA objective 5, P5 - The policy could provide further information following the completion of the OPDC Gypsy and Traveller Accommodation Needs Assessment in light of emerging legislation. IIA objective 6, P4, P5, P6, P8 & P9 - Supporting text could include a strategy for how surface water flood risk may be overcome. This could help deliverability and reduce flood risk. IIA objective 6, P7 - A scheme of planting, connected to a wider green infrastructure network, which may also include SuDS, could be included as a requirement in the Local Plan. IIA objective 6, P10 - Supporting text could include a strategy for how surface water flood risk may be overcome that further relates to the Water Policy. This could help deliverability and reduce flood risk. IIA objective 7, P2 - The introductory text indicates that an Old Oak Common Decentralised Energy Strategy is currently in preparation. It is suggested that the findings of this study are reflected in the			

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
	supporting text, to provide more detail in relation to the supported 'energy centre'. How potential pollution from this facility might be managed could be explained. IIA objective 7, P7 - It is suggested that following the development of further work on the A40, additional detail could be provided for the proposed 'connections' across the A40. IIA objective 8, P9 - Should further information be provided by HS2 regarding their waste management plans, policies are alternative guidance should reflect this. IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development. IIA objective 9, P1 - The management of water quality in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development. IIA objective 9, P4 - It is suggested that water quality issues are also included as a consideration when considering the future use of the canal. IIA objective 10, P1 - Improving connections could be tied to the development of an area-wide multi-functional Green Infrastructure Strategy. The Local Plan text states that this is currently being developed. It is suggested that, when this is available, relevant text is added explicitly to the policy wording to improve deliverability. The management of biodiversity in relation to the new vehicle connection across the Grand Union Canal should be considered to ensure that no significant negative effects arise from its development. IIA objective 10, P2 - The policy should provide further information in the supporting text relating to how development should be 'mindful' of these assets as well as how biodiversity may be enhanced within open spaces. IIA objective 10, P4 - It is recommended that measures to enhance biodiversity are encouraged through the policy wording and set out in the supporting text, including the rationale behind a specific lighting strategy. This should help enable successful implementation. It is suggested that some elements of the policy are re-ordered, so that impacts on the water environment and biodiversity are set out under 'environment' in connection with the green infrastructure network. IIA objective 10, P6, P7 & P8 - It is recommended that measures to improve local biodiversity, such as through the extension of the green infrastructure network into the area, or through street planting/landscaping schemes, could be promoted through the policy to improve both biodiversity. IIA objective 12, P1 - It is suggested that further detail relating to how development should reflect the historic character and appearance of the Old Oak area is reflected in the policy wording and		

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
	supporting text. This should include the identification and protection of local views and the settings of historic assets. However, it is noted that the OPDC Heritage and Views Study is yet to be completed. IIA objective 12, P2 - The policy should seek to reduce repetition within the policy with regards to the ecological and historical character of the Grand Union Canal as well as provide further information in the supporting text relating to how development should be managed in relating to enhancing nature conservation and heritage assets. IIA objective 12, P3 - It is recommended that this requirement from the supporting text is included in the policy wording to improve implementation. IIA objective 14, P8 - Reference to active frontages, as included in the supporting text, should be specified in the policy wording to improve deliverability. IIA objective 14, P10 - The management of the park could include measures to reduce crime and the fear of crime when using or accessing the park, particularly if it would be open during the evenings. IIA objective 15, P6 - Health levels within the area could be improved through the extension of the green infrastructure network through this area, to create more pleasant walking and cycling routes. IIA objective 16, P1, P2, P3 & P4 - Town centre uses could be specified to include education facilities where necessary. IIA objective 17, P1, P2 & P3 - The provision of training facilities could be specified as a requirement in this area in addition to the guidance set out in policy E5. IIA objective 17, P7 - It is unclear from the policy text under b) what exactly the policy is supportive of. This could be made clearer in the policy wording. IIA objective 18, P1 - It is recommended that this is a consideration, and measures to reduce the impact on neighbouring town centres be included within the policy or highlighted to ensure that the intention behind measures is made clear.			
Design	<u>Reg 18</u>: IIA objective 6, D1 - Where necessary, appropriate mitigation measures should be incorporated into development. IIA objective 6, D3 & D5 - Where necessary and appropriate, flood risk mitigation measures and measures supporting climate change adaptation should be incorporated into the design of open space in accordance with the proposed water policy in the Environment and Utilities Chapter.			

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
	IIA objective 7, D5 - Development should seek to incorporate sustainability measures during construction and operation. IIA objective 8, D4 & D5 - Where appropriate waste and recycling facilities should be incorporated and waste minimisation techniques should be encouraged. IIA objective 9, D3, D4 & D5 - Sustainable water measures should be adopted where appropriate. IIA objective 10, D2 & D3 - Where possible, green corridors should be encouraged within development. IIA objective 14, D2 - Development design should seek to optimise natural surveillance and ensure that new spaces and routes are safe.			
Environment and Utilities				
Transport	Reg 18: IIA objective 9, T9 - Appropriate pollution prevention would need to be considered where water transportation is concerned. IIA objective 11, T5 - Recommendation to encourage use of low carbon buses and work with TfL. IIA objective 13, T1, T2 & T3 - A recommendation would be to ensure that the needs to vulnerable and wider diversity groups are factored in to all places as different groups can have different needs. IIA objective 14, T5 - Improved lighting and high quality shelters should be implemented on all bus services and at all bus stops. IIA objective 15, T6 - We recommend that new streets should give consideration to connecting more isolated areas and seek to reduce social exclusion. IIA objective 16, T1, T2, T3, T4 & T5 - We recommend that consideration is given to connecting all residential areas, especially the most deprived to a range of essential services such as schools. IIA objective 16, T1 -			
Housing	Reg 18: IIA objective 1 & 5, H3 - It is suggested that bullet point 3 of the policy is unnecessary and provides repetition that could be excluded. IIA objective 1, H7 - The policy could include a requirement relating to existing shared housing, similar to that included within the supporting text, within the policy wording.			

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
	IIA objective 1, H10 - Measures that could be included to create places within the local communities as a result of student housing could be suggested to enhance their presence within the built environment. IIA objective 2, H8 - The policy wording could usefully identify the need for developments to be high density, if this is appropriate. IIA objective 5, H1 - Details pertaining to what the housing needs will be within the area, in order to identify whether these needs are being 'met' within the housing policies, could be provided in the supporting text. This may be implemented in the next stage of the Local Plan, once the evidence-base studies are complete. It is unclear where the 10% of housing to meet building regulation M4(3) 'wheelchair user dwellings' has come from. Reference to the evidence-base for this proportion could be usefully provided in the supporting text. If this is a standard requirement within the building regulations, it is suggested that it need not be included within the policy wording. IIA objective 5, H5 - It is further recommended that repetition with regards to housing mix is removed between housing policies H3 and H5. The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the accessibility of buildings is brought up to the standard required for new developments. IIA objective 7, H5 - The policy could seek to require that conversions of existing and vacant buildings include provision for ensuring that the energy efficiency of buildings is brought up to the standard required for new developments. IIA objective 7, H8 - It is recommended that high quality design aspects also specify the need for energy efficient design, which should help to reduce the cost of living for older people and improve their health. IIA objective 8, H5 - The policy could add a requirement that conversions do not result in cumulative stress on the local environment, including pollution levels such as air, noise and light pollution as well as the potential impact on biodiversity, land quality and water quality. IIA objective 9, H9 - The policy could include a requirement for the improvement of connections to services and facilities including utilities to the existing site, should this be necessary. Detail relating to this could be included in the supporting text. IIA objective 12, H9 - Proposals for new gypsy and traveller sites could impact on the local historic environment. However, whether there is a need for new sites is currently unknown until the outcomes of the study are published. This could be included in the policy wording as a consideration.			

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
	IIA objective 13, H5 - The policy could be reworded to seek that the conversion of existing dwellings and vacant buildings seeks to enhance the amenity of the local community, as opposed to seeking a minimal effect. IIA objective 13, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. IIA objective 14, H9 - The policy could usefully consider the potential integration of new sites within the surrounding community, as part of the assessment of impacts. This could help to reduce a possible perception of fear of crime. IIA objective 15, H1 - The policy wording could specifically refer to the need for developments to be designed with the health and wellbeing of residents in mind. Design measures might also include measures such as high levels of thermal insulation and the provision of outside space/green roofs for all residents. IIA objective 15, H3 - It is recommended that the next iteration of the Local Plan considers human health as part of the mix of housing provision, through the consideration of design principles alluded to in the supporting text provided for policy H1. It is suggested that the requirements relating to housing mix within policies H1 and H3 are consolidated into the same policy. IIA objective 15, H5 - See recommendation under objective 13. The requirements for new development in terms of requirements for improving mental and physical health should also be applied to the conversion of existing and vacant dwellings, to seek that inequalities are not exacerbated. IIA objective 15, H10 - It is recommended that the policy ensures that new student accommodation is supported by an appropriate level of services and facilities, to meet the needs of the students. This could also help to reduce impacts on residential amenity in a positive way. The creation of new facilities and services might include sports facilities, which could be shared locally.			
Employment	Reg 18: IIA objective 6, E3 - Appropriate climate change mitigation and adaptation measures should be incorporated where possible - as per Preferred Policy Option EU3: Water.			
Town Centres and Community Uses	Reg 18: No recommendations.			

Policy Topic	Policy Recommendations – Reg 18	Policy Recommendations – Reg 19	Integrated into Local Plan – Yes or No?	How Integrated/Taken into Account or Reason for Not Taken into Account
Delivery and Implementation				

ARCADIS Design & Consultancy for natural and built assets

OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION REGULATION 19(2) SECOND REVISED DRAFT LOCAL PLAN

Habitats Regulations Assessment Screening Report

UA008107-R-04

MAY 2018

Incorporating

EC HARRIS BUILT ASSET CONSULTANCY

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Old Oak and Park Royal Development Corporation Regulation 19(2) Second revised draft Local Plan

Habitats Regulations Assessment Screening Report

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VERSION CONTROL

Issue	Revision No.	Date Issued	Description of Revision: Page No.	Description of Revision: Comment	Reviewed by:
001	R01	11th December 2015	n/a	Technical Review – First draft	LH & SKW
002	R02	13th March 2017	n/a	Updated following policy changes	SKW
003	R03	18th April 2017	Page 6 Page 21 – Table 5-2 Page 24 – Table 5-3	Updated following client comments and changes to Environment policies	SKW
004	R04	15th May 2018	Page 3 – Section 2.2 Page 5 – Section 2.4 Page 11 – Table 3-1 Page 21 – Table 5-1 Page 23 – Table 5-2 Page 32 – Table 6-2	Updated following Regulation 19 consultation	SKW

This report dated 15 May 2018 has been prepared for Old Oak and Park Royal Development Corporation (the "Client") in accordance with the terms and conditions of appointment dated 01 May 2015 (the "Appointment") between the Client and **Arcadis Consulting (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

ABBREVIATIONS

cSAC	Candidate Special Area of Conservation
FCS	Favourable Conservation Status
GIA	Gross Internal Area
HGV	Heavy Goods Vehicle
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
HS2	High Speed 2
IROPI	Imperative Reasons of Overriding Public Interest
LBHF	London Borough of Hammersmith and Fulham
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework
OPDC	Old Oak and Park Royal Development Corporation
pSPA	Potential Special Protection Area
SAC	Special Area of Conservation
SIL	Strategic Industrial Location
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

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European Sites surrounding the OPDC area

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European Sites surrounding the OPDC area

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Conservation Objectives

1 INTRODUCTION AND PURPOSE OF THIS REPORT

1.1 Introduction

This Screening Report has been prepared by Arcadis Consulting UK (Ltd) on behalf of the Old Oak and Park Royal Development Corporation (OPDC) as part of the statutory Habitats Regulations Assessment (HRA) of the OPDC Regulation 19(2) Second Revised Draft Local Plan (hereafter referred to as the OPDC Local Plan or the Plan).

The OPDC is a new Local Planning Authority launched on 1st April 2015 spanning the London Boroughs of Brent, Ealing, and Hammersmith and Fulham. Future development within the OPDC area up to 2037 will be guided by the plans and policies within the OPDC Local Plan which will complement those within the London Plan.

1.2 Purpose of this Report

This report is the first stage in the HRA process, commonly referred to as Screening. It identifies whether or not the OPDC Local Plan is likely to result in significant effects upon one or more European sites, either alone or in-combination with other plans or projects and subsequently whether or not an Appropriate Assessment will be required. If Appropriate Assessment is required this document will outline its proposed scope. Further details on the HRA stages are provided in Section 3.

1.3 Background to Habitats Regulations Assessment

Under Article 6 of the Habitats Directive, an assessment is required where a plan or project may give rise to significant effects upon any Natura 2000 sites (also known as 'European sites'). There are no European sites within the OPDC area; however, there are seven sites which form part of the Natura 2000 network that could potentially be affected by the OPDC Local Plan (see section 4.1, also illustrated on Drawing Number 001-UA008107-UE31D-01).

Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SACs), designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPAs), classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government Policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.

The requirements of the Habitats Directive are transposed into law by means of the Conservation of Habitats and Species Regulations 2010 (as amended).

Paragraph 3, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below)*, the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'.*

Paragraph 4, Article 6 of the Habitats Directive states that:

'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'

The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on any European site. If the Screening (the first stage of the process, see Section 3 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on a site's integrity.

1.4 Legislation and Guidance

This HRA screening report has drawn upon the following legislation and guidance:

- The Conservation of Habitats and Species Regulations ~~2010 (as amended~~2017~~)~~. ~~In 2012, these Regulations were amended to transpose more clearly certain aspects of the Habitats Directive. No fundamental changes to the Regulations were made.~~

- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.

- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.

- Department for Communities and Local Government (2006). Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.

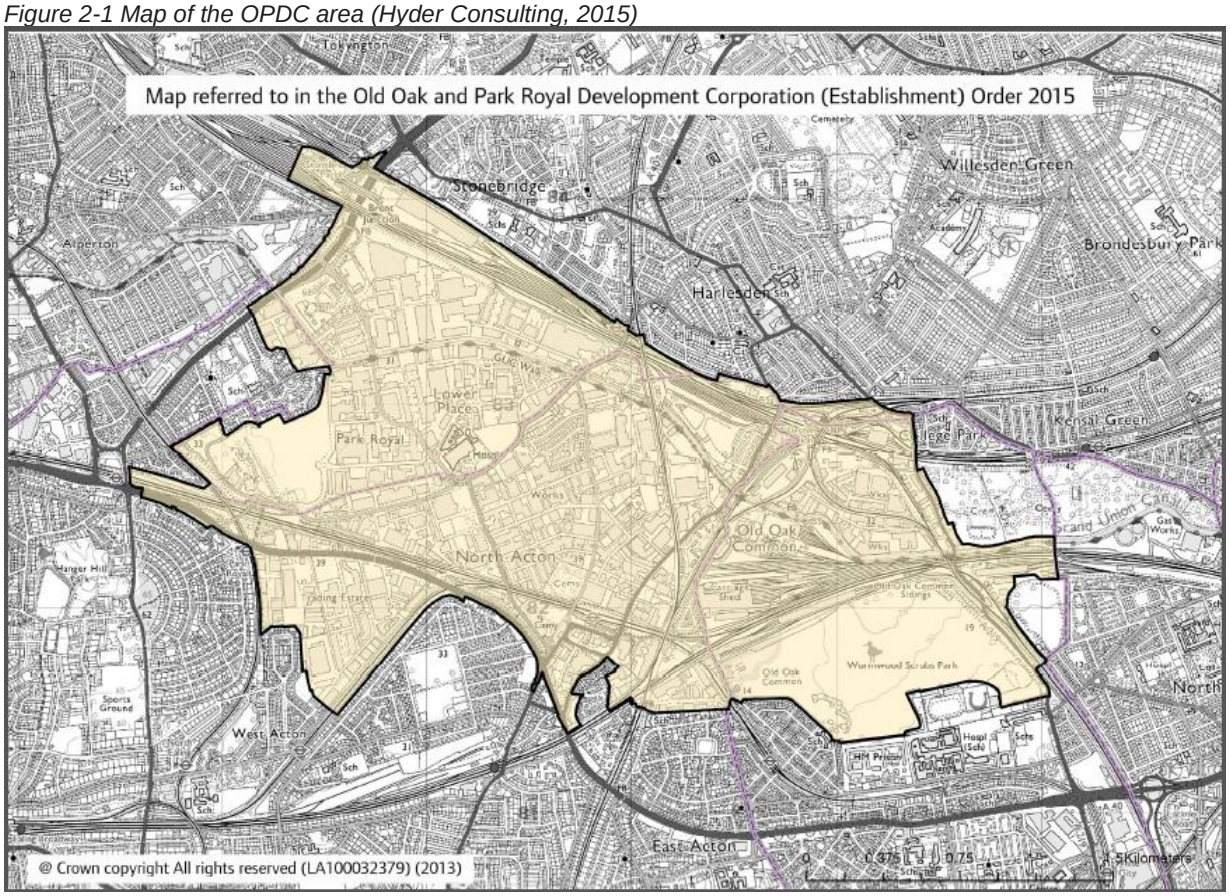
- DTA Publications Limited. The Habitats Regulations Assessment Handbook, accessed online ~~March~~ April ~~2017~~2018.

2 INTRODUCTION TO THE LOCAL PLAN

2.1 Background and Purpose

The OPDC area is a predominantly industrial Borough in north-west London. It spans part of three London Boroughs: the London Borough of Brent in the north, the London Borough of Ealing in the west and south and the London Borough of Hammersmith and Fulham in the east (Figure 2-1).

Figure 2-1 Map of the OPDC area (Hyder Consulting, 2015)



The OPDC Local Plan will provide the locally specific part of the development plan for the OPDC area, whilst the National Planning Policy Framework (NPPF) provides the national framework against which all development in the OPDC area will be assessed. Once adopted, the OPDC Local Plan will supersede the existing Local Plans of the constituent three London Boroughs.

Future development within the OPDC area will be guided by the plans and policies within the OPDC Local Plan, which extends until ~~2037~~2038, to ensure a 20 year plan period.

2.2 Spatial Vision

In order to achieve the spatial vision for the OPDC area, ~~eight~~ narratives have been produced – "thinking big" and "going local". The narratives provide information on the proposed outcomes of development at the national and regional scale and set out how local people would benefit from change and how neighbourhoods would improve.~~y express the purpose of the OPDC Local Plan and are important as they will be used as a measure of the success of the plan in delivering the spatial vision~~

These narratives are as follows:

Thinking Big~~. Old Oak and Park Royal will:~~

1. ~~Improve life chances and fairness for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education and social infrastructure~~High quality design will be showcased as part of new development, that will set new international standards in accessible and inclusive high density commercial, industrial and residential development and open space design and management.

2. ~~Enhance day-to-day quality of life for local people by enabling a sense of ownership and attachment to places and providing access to town centres, shops, GPs, schools, nature and parks, community facilities, leisure and sports~~Old Oak will become a major new London centre providing high-density mixed use development, that will shape west London and support London's continued growth.

3. ~~Capture and generate benefits from early development for local people~~The area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses.

4. ~~Provide a mix of new homes at different prices including affordable housing for local people~~Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond.

5. ~~Support local economies by creating opportunities for local businesses to access new markets, providing employment space and support for new business growth~~Wormwood Scrubs will be accessible MOL that will continue to perform its role as a district and metropolitan park.

6. ~~Create an attractive built environment comprising a network of places, good quality streets, open spaces and well-designed buildings that complements the surrounding neighbourhoods~~It will be an exemplar in healthy and sustainable large-scale development.

7. ~~Conserve and enhance the existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, the Grand Union Canal and the Rolls Royce Factory~~Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth.

~~8. Ensure new development connects local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.~~

~~In addition,~~Going Local

8. ~~Old Oak will be the major transport hub for London, providing a gateway to London, the UK and beyond~~Local economies will be supported by creating opportunities for local businesses to access new markets and provide a mix of employment space to support new business growth.

9. ~~Old Oak will become a major new London centre providing high-density mixed-use development, shaping west London and supporting London's continued growth~~The areas' existing rich social, cultural and built environmental and heritage assets such as Wormwood Scrubs, Kensal Green Cemetery, the Grand Union Canal and the Rolls Royce Factory will be conserved and enhanced.

10. ~~Park Royal will continue to be London's largest and most successful industrial area reflecting its designation as a Strategic Industrial Location to support London's economy with opportunities for intensification and innovative growth~~An attractive built environment will be created

comprising a network of new and enhanced places enabling people to enjoy good quality streets, open spaces and well-designed buildings that complement surrounding neighbourhoods.

11. ~~Wormwood Scrubs will continue to perform its role as a district and metropolitan park~~parka mix of new homes will be delivered at different prices including affordable housing for local people.

12. ~~The area will become a destination for people from across all of London and the UK and will be home to a mix of cultural and leisure uses~~Benefits from development will be generated for local people.

13. ~~High quality design will be showcased in good development which will set new international standards in high density commercial, industrial and residential development~~New development will connect local existing and new communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.

14. ~~It will be an exemplar in international healthy and sustainable large-scale development~~Life chances and fairness will be improved for existing and future communities, with new development providing opportunities to enhance health and well-being, access to skills, education and social infrastructure.

15. Day-to-day quality of life will be enhanced for local people by enabling a sense of ownership, empowerment, safety and provision of convenient access to town centre uses, shops, GPs, schools, nature and parks, community facilities, leisure and sports.

2.3 Local Plan Policies

There are ~~85~~92 policies contained within the OPDC Local Plan which relate to the spatial vision above. These are set out under the following chapter headings:

- Strategic Policies
- Places
- Design
- Environment
- Transport
- Housing
- Employment
- Town Centre and Community Uses
- Delivery and Implementation

2.4 Policies within the OPDC Local Plan

The policies within the OPDC Local Plan are listed below:

Strategic Policies

SP1: ~~City in the West~~Catalyst for Growth

SP2: ~~Excellence and Innovation~~Good Growth

SP3: ~~Health, Wellbeing and Active Lifestyles~~Improving Health and Reducing Health Inequalities

SP4: Thriving Communities

SP5: Economic Resilience

SP6: Places and Destinations

SP7: Connecting People and Places

SP8: Green Infrastructure and Open Space

SP9: Built Environment

SP10: Integrated Delivery

Places

P1: Old Oak South

P1C1: Old Oak Common Station Cluster

P2: Old Oak North

~~P2C1: Grand Union Square Cluster~~

P3: Grand Union Canal

P4: Park Royal West

P4C1: Brewery Cluster

P5: Old Park Royal

P6: Park Royal Centre

~~P6C1: Park Royal ASDA~~

P7: North Acton and Acton Wells

P7C1: North Acton ~~Station~~ Town Centre Cluster

P7C2: Old Oak Common Lane Station Cluster

P8: Old Oak Lane and Old Oak Common Lane

P8C1: Atlas Junction Town Centre Cluster

P9: Channel Gate

P10: Scrubs Lane

P10C1: Harrow Road Cluster

P10C2: Laundry Lane Cluster

P10C3: Hythe Road Cluster

P10C4: Mitre Canalside Cluster

P11: Willesden Junction

~~P11C1: Willesden Junction Station Cluster~~

P12: Wormwood Scrubs

Design

D1: Securing high quality design

D2: Public Realm

D3: Accessible and inclusive design

D4: Well-designed buildings

D5: Tall buildings

D6: Amenity

D7: Key views

D8: Heritage

D9: Play Space

Environment

EU1: Open Space

EU2: Urban Greening and Biodiversity

EU3: Water

EU4: Air Quality

EU5: Noise and vibration

EU6: Waste

EU7: Circular and Sharing economy

EU8: Sustainable materials

EU9: Minimising Carbon Emissions and Overheating

EU10: Energy Systems

EU11: Smart Technology

EU12: Extraction of minerals

EU13: Land contamination

Transport

T1: Roads and streets

T2: Walking

T3: Cycling

T4: Parking

T5: Rail

T6: Buses

T7: Freight, servicing and deliveries

T8: Construction

T9: Transport Assessments and Travel Plans

Housing

H1: Housing Supply

H2: Affordable Housing

H3: Housing Mix

H4: Design of Family Housing

H5: Existing Housing

H6: Build to Rent

H7: Purpose-built ~~Co-Living and other~~Shared Housing ~~with shared facilities~~and Existing HMOs

H8: Gypsy and Traveller Accommodation

H9: Specialist Housing

H10: Student Accommodation

Employment

E1: Protecting, strengthening and intensifying the strategic industrial location~~existing economic and employment functions~~

E2: ~~New B use class employment floor space~~Employment sites outside of SIL

E3: Supporting small businesses and start ups

E4: Work-live units

E5: Local access to training, employment and economic opportunities

Town Centre and Community Uses

TCC1: Locations for and impacts of town centre uses

TCC2: Vibrancy

TCC3: A-class uses

TCC4: Social infrastructure

TCC5: Culture and Art

TCC6: Sports and Leisure

TCC7: Public Houses

TCC8: Catalyst Uses

TCC9: Meanwhile Uses

TCC10: Visitor Accommodation

TCC11: Night-time economy ~~uses~~

Delivery and Implementation

DI1: ~~Funding and Financing Infrastructure~~Balancing Priorities and Securing Infrastructure Delivery

DI2: ~~Community Involvement~~Timely Delivery and Optimised Phasing

DI3: Stakeholder Engagement and Being a Proactive Planning Authority

DI4: Planning Powers and Monitoring

3 THE HABITATS REGULATIONS ASSESSMENT PROCESS

3.1 Stages in HRA

This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

The requirements of the Habitats Directive comprise four distinct stages:

1. **Screening** is the process which initially identifies the likely impacts of a project or plan upon a European site, either alone or in-combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made.
2. **Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
3. **Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. **Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network

3.2 Approach to Screening

This Screening Report takes into account the requirements of the Habitats Directive and relevant guidance produced by David Tyldesley Associates (2017~~5~~).

The following stages have been completed:

- Identification of all European sites potentially affected (including those outside of the OPDC Local Plan area);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the policies which have the potential to affect the European sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the Policy, in line with current guidance);
- A consideration of any impacts in-combination with other plans or projects;
- Where potential effects are identified, avoidance or mitigation measures have been considered in order to avoid significant effects.

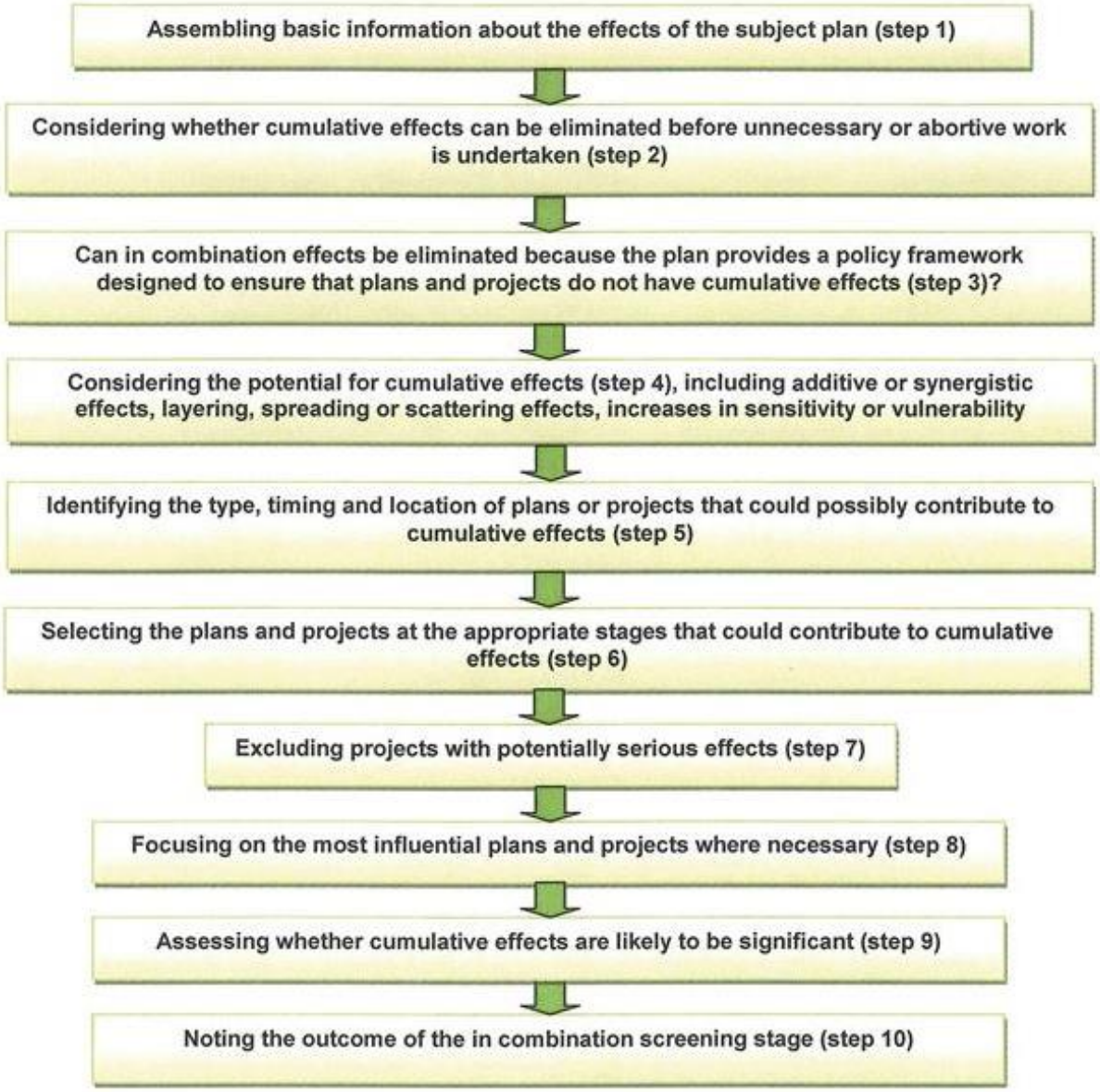
3.3 In-Combination Effects

As outlined in Section 3.1, it is necessary for HRA to consider in-combination effects with other plans and projects.

Where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination, firstly, with other effects of the same plan, and then with the effects of other plans and projects.

The flow chart below is taken from David Tyldesley Associates (2017) and illustrates the outline methodology for the in-combination assessment.

Figure 3-1 Methodology for in-combination assessment



If the prospect of cumulative effects cannot be eliminated in steps 2 and 3 in the figure above, it is necessary to consider how the addition of effects from other plans or projects may produce a combined adverse effect on a European site that would be significant. Taking the effects which would not be likely to be significant alone, it is necessary to make a judgement as to whether these effects would be made more likely or more significant if the effects of other plans or projects are added to them. Most cumulative

effects can be identified by way of the following characteristics. Could additional effects be cumulative because they would:

a) Increase the effects on the qualifying features affected by the subject plan in an additive, or synergistic way?

b) Increase the sensitivity or vulnerability of the qualifying features of the site affected by the subject plan?

c) Be felt more intensely by the same qualifying features over the same area (a layering effect), or by the same qualifying feature over a greater (larger) area (a spreading effect), or by affecting new areas of the same qualifying feature (a scattering effect)?

It will be necessary to look for plans or projects at the following stages:

a) Applications lodged but not yet determined.

b) Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.

c) Refusals subject to appeal procedures and not yet determined.

d) Projects authorised but not yet started.

e) Projects started but not yet completed.

f) Known projects that do not require external authorisation.

g) Proposals in adopted plans.

h) Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.

Consideration of in-combination effects is included in Section 6.5.

Plans under consideration may range from neighbouring authorities' planning documents down to sector-specific strategic plans on such topics as flood risk. A review has been undertaken of plans and projects with the potential for an in-combination effect with the OPDC Local Plan. This information has been provided by OPDC (2017a and 2018) and these plans and projects are listed in Table 3-1.

Table 3-1 – Plans and projects considered for in-combination effects

Authority	Relevant Plan/Project
~~London Borough of Hammersmith and Fulham (LBHF)~~	~~Crossrail Depot and sidings – 8-rail track depot for the Crossrail train fleet.~~
High Speed 2 (HS2) Limited	Old Oak Common Station – new largescale station providing interchanges between HS2 line, Crossrail and Great Western Mainline. Approximately 250,000 passengers passing through daily. ~~NB~~ HS2 bill has ~~yet to~~ received Royal Assent ~~but assumptions are it will~~on 23rd February 2017. Preparation works are currently underway with main construction to commence 2019 (HS2 Ltd).

Authority	Relevant Plan/Project
OPDC	Oaklands South – 3 mixed-use blocks, ranging in height from 6 to 26 storeys. The combined scheme comprises 605 residential units[1] (Use Class C3) and space for 200 jobs within 1,400 sqm of retail and leisure floorspace and 2,000sqm of office floorspace. ~~3,500 sqm of (in part) double height commercial floor space, providing a flexible range of uses (Use Classes A1, A2, A3, A4, B1, D1 and D2).~~ The scheme provides 120 underground car parking spaces, 1,080 cycle spaces, amenity space, landscaping and associated public realm. A new site access road is proposed linking the existing access road and Old Oak Common Lane.
OPDC (determined by London Borough of Ealing)	Holbrook House – ~~part-16/part-18/part-24 storey building with basement for use as student accommodation comprising 424 bed spaces (without both clusters and studios)~~provision of 280 homes[2]~~.; ground floor ancillary student accommodation and a commercial unit for flexible use (Use Classes A1, A2, A3, A5, B1 or D1). Cycle parking, storage and plant space to be located predominantly at ground and basement levels. Servicing and 2 no. disabled car parking bays on-site as well as improvements to the public realm including widening the footpath to North Acton Station and frontages to Victoria Road and Wales Farm Road.~~
OPDC (determined by London Borough of Ealing)	Portal West – ~~four buildings of 2, 9, 11, 32 and 42 storeys comprising 578~~provision of 580 homes[3], 1,600sqm of retail and leisure floorspace and 1,600sqm of office floorspace (class B1). ~~residential flats[4] (Use Class C3) (mix of 1 bed, 2 bed and 3 bed flats) and 3179 sqm (GIA) of flexible use Class A1 and/or A2 and/or A3 and/or A4 and/or B1 and/or D1 and/or D2 floor space, landscaped east-to-west public route between Victoria Road and Portal Way, together with associated amenity and play space, roof gardens, cycle parking, car parking, servicing, public realm improvements, landscaping and infrastructure works.~~
OPDC (determined by London Borough of Ealing)	The Portal – provision of 350 homes[5] and 550sqm of office floorspace (class B1)~~part 10, part 36 storey building comprising 355 residential units[6] and ancillary facilities (Use Class C3) with a mix of studio, 1 bed, 2 bed and 3 bed flats and 549 sqm (GIA) of flexible use Class A1 and/or A2 and or A3 and/or A4 and/or B1 and/or D1 and/or D2 floor space and a landscaped public realm, together with associated public and private amenity space, cycle parking, car parking, servicing, landscaping and other associated works.~~.
OPDC (determined by London Borough of Ealing)	The Perfume Factory North – provision of 400 residential units[7] and 1,400sqm of flexible non-residential floor space~~re-development to provide 528 apartments, 6~~

[1] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[2] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[3] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

~~[4] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.~~

[5] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

~~[6] These residential dwelling are within the OPDC area and would contribute towards the OPDC housing target.~~

[7] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

Authority	Relevant Plan/Project
	~~mews houses and 2 commercial/live work buildings with associated infrastructure[8].~~
OPDC (determined by London Borough of Ealing)	The Perfume Factory South – provision of 300 homes[9] and 5,000sqm of office floor space (class B1).
~~London Borough of Ealing~~	~~Carphone Warehouse – re-development to provide 764 residential flats and approximately 5,000 sqm of flexible commercial space[10].~~
~~Royal Borough of Kensington and Chelsea~~	~~Kensal Canal Side - Provision of 2,000 jobs and 3,500 homes.~~
~~London Borough of Hammersmith and Fulham~~	~~White City - Provision of 10,000 jobs and 6,000 homes of which 5,000 jobs and 1,900 homes have already been provided.~~
London Borough of Brent	Wembley - Provision of 11,000 jobs and 115,000 homes of which 6,400 jobs and 5,500 homes have already been provided.
OPDC	2 Scrubs Lane – provision of 85 homes[11] and 180sqm of retail and leisure floorspace.
OPDC	Mitre Yard – provision of 200 homes[12], 600sqm of retail and leisure floorspace and 500sqm of office floorspace (class B1).
OPDC	North Kensington Gate – provision of 210 homes[13], 550sqm of retail and leisure floorspace and 900sqm office floorspace (class B1).
OPDC (determined by London Borough of Ealing)	1 Portal Way – provision of 760 homes[14], 1,750sqm of retail and leisure floorspace and 1,750sqm office floorspace (class B1).
OPDC (determined by London Borough of Ealing)	2 Portal Way – provision of 380 homes[15] and 5,300sqm office floorspace (class B1).
OPDC	First Central – provision of 800 homes[16] and space for 90 jobs derived from 1,000 sqm of office floorspace.

~~[8] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.~~

[9] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

~~[10] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.~~

[11] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[12] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[13] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[14] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[15] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

[16] These residential dwellings are within the OPDC area and would contribute towards the OPDC housing target.

3.4 Consideration of Effects

3.4.1 Definition of Significant Effects

A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on European Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives.

In considering whether the plan is likely to have a significant effect on a European site, a precautionary approach must be adopted:

- The plan should be considered 'likely' to have such an effect if the plan making Authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects.

- An effect will be 'significant' in this context if it could undermine the site's conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site in question.

3.4.2 Categorising Effects

All elements of the OPDC Local Plan, have been screened for likely significant effects on European sites and categorised in accordance with DTA Publications Limited - The Habitats Regulations Assessment Handbook (accessed online ~~March 2017~~April 2018).

The effects associated with the OPDC Local Plan can be allocated into one of 12 categories according to the ways in which the option, policy or proposal could affect the European site. These are described in Table 3-2 below.

Table 3-~~1~~2 - Screening Assessment Categories

Category	Description
Category A	General statements of policy/general aspirations. Policies which are no more than general statements of policy or general political aspirations should be screened out because they cannot have a significant effect on a site.
Category B	Policies listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.
Category C	Proposal referred to but not proposed by the plan. Screen out any references to specific proposals for projects, such as those which are identified, for example, in higher policy frameworks such as the Wales Spatial Plan or National Policy Statements, relating perhaps to nationally significant infrastructure projects. These will be assessed by the Secretary of State or Welsh Ministers. A useful 'test' as to whether a project should be screened out in this step is to ask the question: 'Is the project provided for/proposed as part of another plan or programme and would it be likely to proceed under the other plan or programme irrespective of whether this subject plan is adopted with or without reference to it?' If the answer is 'yes' it will normally be appropriate to screen the project out in this step.
Category D	Environmental protection/site safeguarding policies. These are policies, the obvious purpose of which is to protect the natural environment, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be

Category	Description
	likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and not undermine their conservation objectives.
Category E	Policies or proposals that steer change in such a way as to protect European sites from adverse effects. These types of policies or proposals will have the effect of steering change away from European sites whose qualifying features may be affected by the change and they can therefore be screened out.
Category F	Policies or proposals that cannot lead to development or other change. Policies that do not themselves lead to development or other change, for example, because they relate to design or other qualitative criteria for development, such as materials for new development. They do not trigger any development or other changes that could affect a European site and can be screened out.
Category G	Policies or proposals that could not have any conceivable adverse effect on a site. Policies which make provision for change but which could have no conceivable effect on a European site, because there is no causal connection or link between them and the qualifying features of any European site, and can therefore be screened out.
Category H	Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policies or proposals which make provision for change but which could have no significant effect on a European site, either alone or in combination with other aspects of the same plan, or in combination with other plans or projects, can be screened out. These may include cases where there are some potential effects which (and theoretically even in combination) would plainly be insignificant and could not undermine the conservation objectives.
Category I	Policies or proposals with a likely significant effect on a site alone. Policies or proposals which are likely to have a significant effect on a European site alone, should be screened in.
Category J	Policies or proposals not likely to have a significant effect alone. These aspects of the plan would have some effect on a site, but the effect would not be likely to be a significant effect; so they must be checked for in-combination (cumulative) effects. They will then be re-categorised as either Category K (no significant effect in combination) or Category L (likely to have a significant effect in-combination), as explained below.
Categories K and L	Policies or proposals not likely to have a significant effect either alone or in-combination (K) or likely to have a significant effect in-combination (L) after the in-combination test. Where an aspect of a plan could have some effect on the qualifying feature(s) or a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination firstly, with other effects of the same plan, and then with the effects of other plans and projects.

3.5 Potential Impacts Pathways

During the HRA screening stage, the likely nature, magnitude, frequency, timing, duration, location and spatial extent of changes resulting from implementation of the Local Plan will be assessed. As a part of this, mechanisms through which the OPDC Local Plan could impact upon European sites will be considered. Further details on the potential impact pathways are presented in Section 6.1.

The main impact pathways could be:

- Direct habitat and species loss within European sites.

- Habitat degradation as a result of increased air pollution.
- Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging).
- Disturbance to habitats and species through increased recreational activity, during operational stage.
- Changes in water quality where sites are hydrologically linked to European sites.
- Disturbance to species as a result of construction activities/operational stage.

4 IDENTIFYING THE EUROPEAN SITES

4.1 Approach to Identifying Sites

There are no European sites located within and on the OPDC boundary. Given the likely distances that mobile species from European sites would travel to land within the OPDC area (or indeed the distances people from the OPDC area might be likely to travel to a sensitive site outside the OPDC area), European sites within a 20 km distance from the OPDC area have been considered as those which may be affected by the Local Plan activities and are detailed in Table 4-1 and shown on Drawing Number 001-UA008107-UE31D-01.

Table 4-1 - Summary of European Sites within 20 km of the OPDC boundary

Name of Site	Identification Number	Designation	Approximate distance from OPDC boundary
Richmond Park	UK0030246	SAC	7.3 km south
Wimbledon Common	UK0030301	SAC	8.3 km south
Lee Valley	UK9012111	SPA	14.3 km north-east
Lee Valley	UK11034	Ramsar Site	14.3 km north-east
South West London Waterbodies	UK9012171	SPA	16.3 km south-west
South West London Waterbodies	UK11065	Ramsar Site	16.3 km south-west
Epping Forest	UK0012720	SAC	17.8 km north-east

Appendix A provides further information regarding the European sites including current conservation status, threats and the results of the most recent condition assessments of the underlying Sites of Special Scientific Interest (SSSIs).

4.2 Impacts and Effects of the Local Plan

The Regulation 19 Draft Local Plan was reviewed and the following potential impact types were identified that may have some effect on European sites and their qualifying species; as shown in Table 4-2, below.

There are no European sites located within and on the OPDC boundary therefore no direct land-take from any European Sites is predicted as a result of plan implementation.

Although there are European designated sites outside of the OPDC area which support mobile species (i.e. birds), these species require wetland/reedbed habitat which is largely absent from within the OPDC area. As such, there will be no loss of habitat which is functionally linked to a European designated site, or any impacts on species using such habitat, as a result of plan implementation.

Given that the closest European designated site is more than 7 km from the OPDC area, and that the OPDC area does not support habitat suitable for mobile species associated with the European designated sites, disturbance to species as a result of construction activities/operational stage activities is considered unlikely to occur as a result of plan implementation.

The Grand Union Canal runs through the OPDC area and is connected to the River Thames at Brentford. Neither watercourse is directly linked to any of the European sites, therefore changes in the water quality of European sites is not considered likely to occur as a result of plan implementation.

The Regulation 19 Local Plan seeks to provide substantial development within the OPDC area. This could lead to impacts on European designated sites outside of the OPDC through increased recreational pressure (as a result of local population growth) and a reduction in air quality (due to increased traffic).

Table 4-2 - Potential Impacts and Effects of the Local Plan on European Sites beyond the OPDC boundary

Potential impacts and effects of the Local Plan	European sites and features potentially affected
Increased disturbance of species through increased recreational pressure as a result of population growth within the OPDC area.	Richmond Park SAC – Stag beetle (*Lucanus cervus*) Wimbledon Common SAC – Stag beetle Lee Valley SPA – over wintering birds Lee Valley Ramsar – migrant and overwintering birds South West London Waterbodies SPA – over wintering birds South West London Waterbodies Ramsar – migrant and over wintering birds Epping Forest SAC – Stag beetle
Degradation of habitat due to increased recreational pressure as a result of population growth within the OPDC area	Wimbledon Common SAC –North Atlantic wet heaths with *Erica tetralix*, European dry heaths. Epping Forest SAC – Atlantic acidophilous beech forests North Atlantic wet heaths with *Erica tetralix*, European dry heaths
Impacts on European sites outside the OPDC boundary as a result of changes in air quality from increased traffic and development.	Wimbledon Common SAC –North Atlantic wet heaths with *Erica tetralix*, European dry heaths. Epping Forest SAC – Atlantic acidophilous beech forests North Atlantic wet heaths with *Erica tetralix*, European dry heaths

4.3 Conservation Objectives of the European Sites

~~Under Regulation 35(3) of the Conservation of Habitats and Species Regulations 2010 (as amended) the appropriate statutory nature conservation body (in this case Natural England) has a duty to communicate the conservation objectives for a European site to the relevant/competent authority responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.~~

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and
- Conservation status of typical species is favourable as defined in Article 1(i).

The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;

- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and

- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Guidance from the European Commission (2000) indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

Conservation Objectives for Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA, South West London Waterbodies SPA and Epping Forest SAC site were obtained from Natural England's (2017) website and are provided in Appendix B.

5 SCREENING

5.1 Context

The OPDC Local Plan contains a spatial vision that sets out how the Development Corporation would like the Old Oak and Park Royal area to develop over the Plan period. It seeks to ~~enhance health and well-being through significant development and sustainable regeneration to deliver homes and jobs with excellent public transport links to London and beyond~~pioneer international excellence in sustainability, health and wellbeing and design quality to deliver tangible benefits for both local communities and London.

5.2 Screening Approach taken for the Local Plan

The screening process has been split into two distinct stages: initial screening and detailed screening. The initial screening stage has provided a high-level screening 'matrix style' assessment to determine if the OPDC Local Plan could possibly lead to significant adverse effects on European sites identified in Section 4.1. The purpose of this is to eliminate those policies from the assessment which very clearly would not affect European sites in order to focus on those policies where there is potential for effects or uncertainty about potential effects. These policies are generally those that could not lead to 'direct development', or could have no impact pathway to any of the European sites identified. The policies that are identified as having potential impacts on the European sites or those policies for which impacts are uncertain, will be carried forward into a more detailed screening assessment.

When identifying the elements of the OPDC Local Plan that could potentially affect European sites, it is important to focus upon those elements that will have the greatest likelihood of impacting the sites. Therefore, the definition of significance identified in Section 3.4.1 is very important for the detailed screening.

The OPDC Local Plan is intended to be read as a single document rather than a series of separate policies, and has been assessed as such. Proposals in one area of the Local Plan may mitigate potentially damaging activities promoted in another area and should be understood in the wider context of the Plan's aims and purposes.

The sections below outline the initial and detailed screening of the OPDC Local Plan.

5.3 Initial Screening of the Local Plan Policies

The initial screening of the OPDC Local Plan is presented in Table 5-1 below.

The policies within the sub-headings were initially examined to determine their need for further detailed screening. The notations below are used to indicate if further detailed assessment screening is required:

✓ Further detailed screening is required to determine the nature of effects on the European site.

X No further screening is required as no significant effects are predicted on the European site.

Table 5-1- Initial screening of the OPDC Local Plan

European Sites	Strategic Policies	Places	Design	Environment	Transport	Housing	Employment	Town Centre and Community Uses	Delivery and Implementation
Richmond Park SAC	✓	✓	x	✓	✓	✓	✓	✓	x
Wimbledon Common SAC	✓	x	x	✓	✓	✓	✓	✓	x
Lee Valley SPA	x	x	x	x	x	x	x	x	x
Lee Valley Ramsar	x	x	x	x	x	x	x	x	x
South West London Waterbodies SPA	x	x	x	x	x	x	x	x	x
South West London Waterbodies Ramsar	x	x	x	x	x	x	x	x	x
Epping Forest SAC	x	x	x	✓	x	x	✓	x	x
Policies Screened In	SP3, SP4, SP5, SP7	P3, P4		EU6	T3, T7, T8	H1	~~E1, E2~~	TCC10	
Policies Screened out	SP1, SP2, SP6, SP8, SP9, SP10	P1, P1C1, P2, ~~P2C1~~, P4C1, P5, P6, P7, P7C1, P7C2, P8, P8C1, P9, P10, P10C1, P10C2, P10C3, P10C4, P11, ~~P11C1,~~ P12	D1, D2, D3, D4, D5, D6, D7, D8, D9	EU1, EU2, EU3, EU4, EU5, EU7, EU8, EU9, EU10, EU11, EU12, EU13	T1, T2, T4, T5, T6, T9	H2, H3, H4, H5, H6, H7, H8, H9, H10	E1, E2, E3, E4, E5	TCC1, TCC2, TCC3, TCC4, TCC5, TCC6, TCC7, TCC8, TCC9, TCC11	DI1, DI2, DI3, DI4

Data from Visit England (~~2015~~2016) indicates that for trips to/within London and lasting 3 hours or more:

- ~~13.6~~14% of trips are related to outdoor leisure activities such as walking/cycling.
- 16.2~~7~~% of people travel 5-10 miles (8-16.1 km)
- 13.4~~5~~% of people travel 11-20 miles (17.7-32.2 km); and
- The London Underground was used on ~~92.7~~83.6% of trips compared to train (used on ~~33.4~~31.6% of trips) and car (used on ~~34.5~~37.9% of trips).

Lee Valley SPA/Ramsar Site is located within Lee Valley Regional Park which receives four million visitors per year (Wetland Link International, 2012). Public transport to the site from the OPDC area requires an extensive journey across London comprising a change of tube line (onto the London Overground) or journey into London Liverpool Street for a connecting train on the Greater Anglia line. South West London Waterbodies SPA/Ramsar site is even further from the OPDC area and public transport to the site requires a journey on the South West Trains line. Due to the distance to either of these sites (more than 14 km from the OPDC area), all policies have been screened out in relation to Lee Valley SPA/Ramsar Site and South West London Waterbodies SPA/Ramsar as (based on the figures above) they are unlikely to be subject to significant impacts from recreational pressure.

Following the initial screening of the OPDC Local Plan, policies contained within three ~~wo~~ of the sub-headings in the plan can be screened out completely from further assessment, on the basis that no identifiable impact pathway exists linking the policies with the European designated sites and/or because there will be no foreseeable adverse impact on European sites through Policy implementation. In addition, several further policies under each of the sub-headings have been screened out of further assessment on a similar reasoning. Table 5-2 provides a summary of the policies screened out of further assessment.

Table 5-2 - Policies screened out of further assessment

Policy	Justification	Assessment Category[17]
Strategic Policies SP1, SP2, SP6, SP8, SP9, SP10	Policy SP1 aims to ~~capitalise on the new strategic transport infrastructure hub of Old Oak Common Station and provide a range of land uses to support London's role as an economic and cultural capital~~deliver a world-class transport super-hub at Old Oak Common, supporting the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels. Policy SP2 aims to ~~establish high standards of sustainable development~~deliver a new part of London, that supports best practice and innovative approaches to achieving high density, high quality development across the environmental, social and economic strands of sustainability. Policy SP6 aims to create ~~distinctive places and clusters with a range of town centre uses~~ a range of locally distinctive places that celebrate local context and provide a range of active destinations for locals and Londoner's, including catalyst uses, meanwhile uses and a new town centre hierarchy that meets needs and complements surrounding centres. Policy SP8 aims to ~~deliver and/or contribute to high quality green infrastructure and open spaces~~contribute to the All London Green Grid by delivering a new or enhanced green infrastructure and open spaces that provide for a range of functions, serving people and nature. Policy SP9 aims to deliver ~~buildings of high design quality and architecture and respond to the setting of sensitive locations~~a well-designed, high quality and resilient built environment, that supports the creation of a new high density part of London, positively shaped by local context, character and heritage. Policy SP10 aims to ~~support an integrated approach to the delivery of development and infrastructure~~deliver development in a comprehensive, timely and coordinated manner, supported by a range of infrastructure that enables an optimised approach to development, making the best use of land. These are high level policies that provide the key big policy statements for the OPDC area and can therefore be screened out – detailed thematic policies to deliver the Strategic Policies are described below and assessed on their own merits.	A, B
Places P1, P1C1, P2, ~~P2C1,~~ P4C1, P5, P6, P7, P7C1, P7C2, P8, P8C1, P9, P10, P10C1, P10C2, P10C3,	Places policies relate to the delivery and design of new town centres, including aspects such as public realm, heritage and character and building heights. These policies are not anticipated to have any impacts on European sites.	B

[17] Taken from David Tyldesley Associates (2017).

Policy	Justification	Assessment Category[17]
P10C4, P11, ~~P11C1,~~ P12		
Design D1, D2, D3, D4, D5, D6, D7, D8, D9	Policies D1 to D~~9~~5 relate to the aim to deliver a high quality and well-designed built environment. None of these policies are anticipated to have any impacts on European sites.	F
Environment EU1, EU2, EU3, EU4, EU5, EU7, EU8, EU9, EU10, EU11, EU12, EU13	Policy EU1 relates to the provision of a high quality green infrastructure and open space network. Policy EU2 aims to ~~enhance~~ secure an overall increase in green cover and a net gain in biodiversity. Policy EU3 relates to the efficient and sustainable use of water resources and water management. Policy EU4 aims to ~~reduce/minimise air quality emissions. Development should comply with the relevant borough's Air Quality Action Plan~~minimise air pollution and make a positive contribution to overall improvement in air quality. Policy EU5 relates to the assessment and minimisation of noise and vibration impacts as a result of development. Policy EU7 relates to the submission of a Circular and Sharing Economy Statement for major development proposals. Policy EU8 promotes the use of high-quality~~,~~ durable and~~,~~ adaptable ~~and sustainable~~ materials. Policy EU9 aims to ensure developments meet/exceed on-site carbon emissions standards and address the risks of overheating. Policy EU10 aims to promote the delivery or low carbon, energy efficient and integrated electricity~~, and~~ heat and cooling networks. Policy EU11 aspires to position Old Oak and Park Royal as a world leading location for~~of~~ the adoption of smart city technologies, systems and approaches. Policy EU12 relates to extraction of minerals. Policy EU13 stipulates that proposals must treat/contain/control contamination. These policies aim to protect/enhance the natural environment and are unlikely to lead to any adverse effects on European designated sites.	D, G
Transport T1, T2, T4, T5, T6, T9	Policy T1 aims to provide "healthy streets" which are future-proofed against changes in the surrounding context, lifestyle and technology. Policy T2 aims to provide new and enhanced walking infrastructure. Policy T4 aspires to an exemplar low carbon development, promoting a shift towards sustainable transport. Policies T5 and T6 aim to deliver/contribute towards rail and bus infrastructure and capacity. Policy T9 stipulates the requirement for transport assessments and travel plans in accordance with Transport for London's Best Practice Guidance.	G, A

Policy	Justification	Assessment Category[17]
	These policies are unlikely to result in detrimental impacts to European designated sites.	
Housing H2, H3, H4, H5, H6, H7, H8, H9, H10	Policy H2 relates to ~~the requirement for~~provision of affordable housing. Policy H3 relates to the housing mix required. Policy H4 relates to the provision of family housing and requirement for access to amenity space. Policy H5 aims to resist the loss of existing residential accommodation and promotes bring~~ing~~ vacant residential properties back into use. Policy H6 details the provisions for Private Rented Sector accommodation. Policy H7 relates to the provision of purpose-built ~~co-living accommodation and housing with~~ shared housing schemes~~facilities~~. Policy H8 aims to ~~protect~~ safeguard existing traveller sites and secure a sufficient supply of plots/pitches to meet the needs of gypsy and traveller households. Policy H9 relates to the provision of specialist housing ~~and~~ to support the needs of~~for~~ older and/or vulnerable people. Policy H10 relates to the provision of student accommodation. None of these policies are anticipated to have any significant impacts on European sites.	G
Employment E1, E2, E3, E4, E5	Policy E1 relates to the protection, strengthening and intensification of land within the designated SIL boundary. Policy E2 relates to the provision of employment floorspace outside of the SIL. Policy E3 relates to the provision of ~~low cost and/or open~~affordable workspaces and small business units to support small businesses and start-ups ~~(employing <10 people)~~. Policy E4 relates to the provision of work-live units. Policy E5 ~~aims to provide access for local people to skills/training/employment~~relates to the delivery of a Local Labour, Skills and Employment Strategy and Management Plan. None of these policies are anticipated to have any impacts on European sites.	F, G
Town Centre and Community Uses TCC1, TCC2, TCC3, TCC4, TCC5, TCC6, TCC7, TCC8, TCC9, TCC11	Policy TCC1 relates to the locations for and impacts of ~~designated~~ town centres uses and the provision of a Town Centre Uses Statement. Policy TCC2 relates to the facilities provided by the town centres and how these should support residential amenity and the public realm. Policy TCC3 relates to the provision of A-Class uses. Policy TCC4 relates to the provision of high quality social infrastructure facilities. Policy TCC5 relates to the provision of high quality cultural facilities. Policy TCC6 relates to the provision of high quality public and private sports and leisure facilities. Policy TCC7 relates to the retention of public houses. Policy TCC8 relates to the requirement for Catalyst Uses Statements.	G

Policy	Justification	Assessment Category[17]
	Policy TCC9 relates to the provision for meanwhile uses. Policy TCC11 relates to the provision of facilities to support a night-time economy. None of these policies are anticipated to have any impacts on European sites.	
Delivery and Implementation DI1, DI2, DI3, DI4	Policy DI1 relates to balancing development priorities and the funding and financing of infrastructure to support and mitigate the impacts of development. Policy DI2 ~~aims to support community involvement in the planning and delivery of development~~relates to the timely delivery of development. Policy DI3 aims to proactively engage with stakeholders and encourage active participation in the planning and delivery of development. Policy DI4 relates to OPDC's planning powers and monitoring of Key Performance Indicators. None of these policies are anticipated to have any impacts on European sites	B

Table 5-3 provides a justification for the policies screened in for further assessment.

Table 5-3 – Policies screened in for further assessment

Policy	Justification
Strategic Policies SP3, SP4, SP5, SP7	The following strategic policies have been screened in on the basis of links with specific policies detailed within this table: Policy SP3 aims to ~~promote health, well-being and active lifestyles~~create a place that enables active and healthy lifestyles, improves mental and physical health and well-being and reduces health inequalities. This is linked with Policy SP7 (linked with Policy P3) which aims to deliver a highly connected, high quality and efficient transport network, that enhances local and strategic transport accessibility and supports the Mayor's ambition for 80% of journeys in London to be made by walking, cycling or public transport. These policies could result in impacts on European designated sites through increased visitor pressure. ~~and policy SP7 aims to create/contribute to a high quality, safe and accessible transport network which is embedded into the built environment with the provision of new/improved walking/cycling routes. These policies are linked with policies P3 and P4 and could result in impacts on European designated sites through increased visitor pressure.~~ Policy SP4 aims to ~~promote social integration of new and existing communities, including the provision of new homes~~create sustainable communities by providing a range of housing types and affordabilities, that meets local, and that contributes to strategic housing needs, supported by a range of high quality social infrastructure facilities that server the current and future community. This policy is linked with policy H1 and could result in impacts on European designated sites through increased visitor pressure. Policy SP5 aims to support the delivery of ~~60,000~~ 40,400 new jobs over the plan period~~, and is linked with policy E2.~~ This could lead to effects on European designated sites through increased air pollution as a result of increased commuter and business-related travel/transport.

Policy	Justification
Places P3, P4	Policy~~ies~~ P3 ~~and P4~~ aspire~~s~~ that the Grand Union Canal (which is directly linked to the River Thames) will be key artery through the OPDC area, providing new bridges, walking and cycling routes as well as passenger, leisure and freight transport. Policy P4 is closely linked to Policy P3, aiming to contribute to/deliver improvements which support public access into green infrastructure assets including the Grand Union Canal. An increase in people movements and increased accessibility could lead to increased visitor pressure on Richmond Park SAC and Wimbledon Common SAC which can be accessed via public rights of way along the River Thames. Increased freight transport could lead to a reduction in air quality, impacting habitats within nearby designated sites.
Environment EU6	Policy EU6 relates to waste management and requires the relocation of waste sites within the OPDC area to, ideally, other sites within the borough, or other sites within west London and Greater London where waste sites within the OPDC area are lost to a non-waste use. This policy has the potential to result in increased road and non-road-based transport within Greater London (leading to reduced air quality), potentially in areas close to European designated sites.
Transport T3, T7, T8	Policy T3 aims to deliver and/or contribute to new ~~and existing~~ cycle ~~networks~~infrastructure, ensuring they connect into and support the wider, existing cycle ~~highway~~ network ~~along~~ such as the Grand Union Canal ~~and wider cycle networks and cycle superhighway programme~~. Policy T7 aims to maximise efficient and sustainable ways of delivering goods including rail and water. Policy T8 aims to maximise use of rail and water transport for construction deliveries and removal of construction waste. An increase in people movements along the Grand Union Canal (which is directly linked to the River Thames) could lead to increased visitor pressure on Richmond Park SAC and Wimbledon Common SAC which can be accessed via public rights of way along the River Thames. Increased transport along the Grand Union Canal could lead to a reduction in air quality, impacting habitats within nearby designated sites.
Housing H1	Policy H1 propose~~s~~ the delivery of a minimum of 20,100 ~~21,322~~ new homes within the OPDC area. This could lead to potential effects on European Sites during operation (e.g. through increased visitor pressure).
~~**Employment**~~ ~~E1, E2~~	~~Policy E1 supports the relocation of existing Class B use employment space to alternative locations outside of the OPDC area where there are insufficient premises within the OPDC area.~~ ~~This policy has the potential to result in increased road and non-road based transport (leading to reduced air quality) and construction/redevelopment effects potentially in areas close to European designated sites.~~ ~~Policy E2 aims to provide significant Class B use employment space as a result of redevelopment and intensification.~~ ~~This could lead to effects on European sites through increased air pollution as a result of increased commuter and business related travel/transport.~~
Town Centre and Community Uses TCC10	Policy TCC10 aims to contribute towards the need for ~~high quality hotel bed spaces~~visitor accommodation (58~~40~~,000 required across London by 2041). This could lead to effects on European sites through increased air pollution as a result of increased transport of visitors to and around the city and also increased visitor pressure on nearby European sites.

6 DETAILED SCREENING OF THE OPDC LOCAL PLAN POLICIES

The detailed screening of the OPDC Local Plan policies in relation to the European Sites is presented below, and is based on the findings of the initial screening exercise.

6.1 Potential Impacts

The Local Plan was reviewed and the following potential impact types were identified that may have adverse impacts on European sites and their qualifying species.

Habitat degradation as a result of increased air pollution

Changes in air quality from increased traffic (both construction and operational) and development as a result of implementation of policies SP5, P3, P4, EU6, T7, T8, H1~~, E1, E2~~ and TCC10 could have impacts on nearby European sites. For example, changes in air quality as a result of increased population and road/rail-based traffic may affect habitats that are sensitive to increased nitrogen deposition if sustainable transport modes are not implemented. This is in contrast to the conservation objectives for Wimbledon Common SAC and Epping Forest SAC which aim to maintain/restore the extent, distribution, structure and function of the qualifying habitats.

Potential adverse impacts on air quality as a result of increased population and therefore road/rail-based traffic may affect habitats that are sensitive to increased nitrous oxides (NO_x), nitrogen deposition (N) and sulphur dioxide (SO_2). The deposition of pollutants on vegetation can damage the vegetation directly or can affect plant health and productivity. In addition, the characteristics of the soil can be altered (for example pH) which in turn can affect plant health, productivity and species composition. The following pollutants are of most concern with respect to vehicular and rail emissions:

Nitrogen oxides (NO_x)

Nitrogen oxides are produced in combustion processes, partly from nitrogen compounds in fuel, but mostly by a direct combination of atmospheric nitrogen and oxygen in flames. Nitric oxide (NO) and nitrogen dioxide (NO_2) are collectively are known as NO_x. The UK emits around ~~2.2~~0.89 million tonnes of NO_2 per year ~~((Air Pollution Information System (APIS), 2014a)~~, about ~~half~~ 49% of which results from transport (DEFRA, 2018)~~comes from motor vehicles~~ while non-road diesel machinery accounts for around 15% of NOx emissions in the EU (European Federation of Transport and Environment, 201~~8~~3).

Ammonia (NH_4)

Agriculture accounted for approximately 88% of total ammonia emissions in the UK in 2016. Other significant contributions to the total come from waste disposal (4%) and road transport (2%) (DEFRA, 2018). ~~Ammonia in the atmosphere results primarily from the decomposition and volatilisation of animal wastes and fertilisers (APIS, 2014b). It is also emitted from petrol vehicles fitted with catalytic converters and heavy duty vehicles fitted with selective catalytic reduction.~~

Effects of pollutants

Nitrogen deposition is the term used to describe the transfer of nitrogen from the atmosphere to the earth. Nitrogen is an essential plant nutrient, and, as such, some of the nitrogen-containing pollutants, such as NO_x and ammonia, can be absorbed by plants. However, too much nitrogen can lead to eutrophication, creating conditions which favour plants with a high demand for nitrogen. Many lower plants (bryophytes and lichens) and communities that thrive in low nutrient conditions, such as heathlands, undergo changes in species composition as a result of the 'fertiliser effect' of eutrophication. Grass species can increase and species diversity of bryophytes and lichens can decline.

Acid deposition represents the mix of pollutants, which include NO_x and ammonia, that together lead to the acidification of soils and freshwater. Acidification - a loss of alkali nutrients (calcium, magnesium and potassium) through leaching and their replacement with acidic elements such as hydrogen and aluminium - is toxic to plants.

A high proportion of employees within Park Royal currently travel to work by car , ~~entering via one of four primary roads and~~ with approximately 35% of journeys within a 5 km radius (OPDC, 2017b). Given the distances between the OPDC area and the European designated sites which could be impacted by reduced air quality (Wimbledon Common SAC 8.3 km south and Epping Forest SAC 17.8km north-east), and that the OPDC Local Plan supports sustainable travel by public transport, significant effects on European designated sites are not anticipated as a result of increased pedestrian movements and employment opportunities.

The Local Plan aspires to improving public transport with increased train and tube links and as the tube is the most popular mode of transport for trips to/within London lasting 3 hours or more there is a risk that this could increase accessibility to European designated sites. However, the nearest tube/train station is 1.2 km from Richmond Park SAC and 1.7 km from Wimbledon Common SAC and require a change of tube line or connecting main line train and it is therefore considered unlikely that any significant number of people would make this journey.

Any construction sites or routes used by construction/transportation vehicles within 50 m of a European site (Institute of Air Quality Management, 2014) and any European site within 200 m of the main access roads used by HGVs accessing the site (Highways Agency, 2007) could lead to significant effects and would require assessment at the project level. The main access routes to the OPDC area are the M4, A40 and North/South Circular, all of which are more than 500 m from European designated sites therefore no significant effects as a result of vehicle emissions during construction are anticipated.

As only 6% of European cargo is transported on barges (European Federation for Transport and Environment, 2018~~3~~) freight movements along the Grand Union Canal and the connecting River Thames (6.1 km and 2.3 km respectively from Wimbledon Common SAC)) are not expected to result in significant emissions and impacts on European designated sites.

An increased reliability on rail transport for the delivery of construction/freight materials is considered beneficial as rail produces up to 15 times less NOx emissions than HGVs for the equivalent journey (Freight on Rail, 2017) In addition, HGVs make up 5% of road miles driven in the UK but produce around 50% of the NOx pollution from road pollution on the strategic road network (Freight on Rail, 2017). The rail network is situated further from the European designated sites than the main road access routes into the OPDC area (M4, A40 and North/South Circular) and the impact of rail-based emissions is therefore likely to be less than that caused by road-based transport.

It is concluded that policies SP5, P3, P4, EU6, T7, T8, H1, ~~E1, E2~~ and TCC10 would be unlikely to result in significant effects on habitats associated with European designated sites as a result of increased air pollution.

Habitat degradation and disturbance to habitats and species through increased recreational activity during operational stage

An increase in population (as a result of approximately ~~21,000~~22,~~350~~20,100 new homes, improved travel infrastructure and additional visitor accommodation as a result of implementation of policies SP3, SP4, SP7, P3, P4, T3, H1 and TCC10) could lead to increased recreational pressure as a result of additional people in the OPDC area and the potential consequent increases in people visiting the European sites such as trampling of vegetation, soil compaction and erosion. This is in contrast to the conservation objectives for Wimbledon Common and Richmond Park SACs which aim to maintain/restore the extent, distribution, structure and function of qualifying habitats and habitats of qualifying species (i.e. stag beetle).

As the OPDC Local Plan includes for the provision of green/open space and enhancements and improved access to Wormwood Scrubs under policy P12, the number of OPDC residents and visitors choosing to visit European designated sites in preference to similar, closer, local destinations (e.g. Hyde

Park and Regents Park which are both within 5 km of the OPDC area) is considered to be low. Any increase in visitor numbers as a result of development within the OPDC area is therefore unlikely to cause a significant disturbance to habitats and species within European designated sites.

The improved cycle network along the Grand Union Canal proposed under policies P3 and P4 will provide no direct links to any European designated sites as the nearest bridge across the River Thames is 1.87 km from the Grand Union Canal southern towpath and 3.35 km from the nearest European designated site (Richmond Park SAC). It is considered unlikely that any significant number of cyclists would travel this distance (which is ~~above~~ close to the average ~~4.8~~5.6 km (3.5 mile) cycle trip length for England (Cyclists' Touring Club, 201~~8~~6)), particularly as only 24% of respondents to a 2013-2014 survey in Richmond Park SAC arrived at the site by bicycle with car being the most popular mode of transport of the site (56% of respondents) (The Royal Parks, 2015).

It is concluded that policies SP3, SP4, SP7, P3, P4, T3, H1 and TCC10 would be unlikely to result in significant effects on habitats and species associated with European sites as a result of increased recreational pressure.

6.2 Summary of potential impacts

Table 6-1 provides a summary of the features of the European Sites that could be affected by policies within the OPDC Local Plan, either on their own, or in-combination with other plans and policies.

Table 6-1 - European features that could be affected by the OPDC Local Plan

Potential Impacts of Local Plan	Policies leading to potential impacts	European Sites and Features Potentially Affected	Conclusion following detailed assessment
Increased recreational pressure through trampling of sensitive vegetation, and physical disturbance of qualifying interest species	SP3, SP4, SP7, P3, P4, T3, H1, TCC10	Stag beetle populations at Richmond Park SAC and Wimbledon Common SAC Heathland habitats at Wimbledon Common SAC	Screened out due to distances people are required to travel, ease of travel to these locations and presence of alternative recreational areas within a shorter distance (e.g. Wormwood Scrubs (within OPDC area and with proposed improvements to public access under policy P12), Hyde Park (4.2 km) and Regents Park (4.4 km)
Increases in air pollution due to increase in road/rail traffic as a result of residential/industrial development and additional employment; relocation of waste facilities/treatment outside of the OPDC area	SP5, P3, P4, EU6, T7, T8, H1, ~~E1, E2,~~ TCC10	Heathland habitats of Wimbledon Common SAC Beech forests and wet heath habitats of Epping Forest SAC	Screened out due to distance from OPDC area

6.3 Avoidance and Mitigation Potential

This screening exercise has not identified any likely significant effects on any European designated sites as a result of implementation of the plan. As such, no specific avoidance or mitigation measures (above and beyond standard mitigation measures that are required of developments, such as pollution prevention) are considered necessary.

6.4 Screening Summary

Following the initial screening of the OPDC Local Plan, a number of policies were screened out completely from further assessment on the basis either of no identifiable impact pathway linking the policies with the European Sites or that there will be no foreseeable adverse impact on European sites through Policy implementation (refer to Table 5-2).

Policies SP3, SP4, SP5, SP7, P3, P4, EU6, T3, T7, T8, H1, ~~E1, E2~~ and TCC10 were screened in for more detailed screening. Potential impacts identified comprised:

- Habitat degradation as a result of increased air pollution in relation to Wimbledon Common SAC and Epping Forest SAC.
- Disturbance to habitats and species through increased recreational activity, during the operational stage in relation to Richmond Park SAC and Wimbledon Common SAC.

It is considered that any air quality effects that may arise from the OPDC Local Plan policies are very unlikely to be significant, given the distance between the European Sites and the OPDC area. The implementation of standard mitigation measures that are required of developments (such as pollution prevention) to meet with National Policies and frameworks also provide a further 'safety net' to

ensure that significant damage to European Sites is avoided.

It is also considered that any disturbance effects that may arise from increased recreational activity are very unlikely to be significant, given the proximity of alternative green/open spaces to the OPDC area.

6.5 In-Combination Effects

The HRA also needs to consider in-combination effects between the various elements of the OPDC Local Plan itself and that the 'screened in' policies within the OPDC Local Plan may have a significant impact in combination with other plans and projects within the local area. OPDC Local Plan

Most of the policies were screened out completely from further assessment at the initial screening stage on the basis either of no identifiable impact pathway linking the policies with the European designated sites or that there will be no foreseeable adverse impact on European designated sites through Policy implementation.

Only twelve~~fourteen~~ policies were screened in for more detailed screening, but it was concluded that their implementation would not result in significant effects on any European designated site. As such, it is considered unlikely that there would be significant in-combination effects on European designated sites as a result of the implementation of the Plan as a whole.

6.5.1 Other plans or projects

Only the effects of other plans or projects which (like those of the plan under consideration here) alone would not be likely to be significant, need to be included in the in-combination assessment. The in-combinations steps should be carefully scoped to relate only to relevant stages of other plans or projects and only to those which could make the possible adverse effects of the subject plan or project more likely or more significant (David Tyldesley Associates, 2017). If the effects of other plans or projects will already be significant on their own, they are not added to those associated with the OPDC Local Plan.

To be relevant to the in-combination assessment, the residual effects of other plans or projects will need to either make the unlikely effects of the OPDC Local Plan likely, or insignificant effects of the plan significant, or both. An assessment has therefore been made of the 'other' plans and projects listed in Table 6-2 with a view to determining whether or not they would result in impacts which, in combination with the policies set out in the OPDC Local Plan could lead to significant impacts on European sites.

Table 6-2 outlines relevant plans and projects that were considered in-combination with the OPDC Local Plan.

Table 6-2 - In-combination effects

Plan/project	Potential effect of plan/Policy	Conclusion
~~London Borough of Hammersmith and Fulham – Provision of Crossrail Depot and sidings~~	~~The site is located within the OPDC area. Construction activities could lead to a reduction in air quality during construction.~~	~~The distance to the European designated sites is considered to be too great to lead to any significant impacts as a result of construction activities. No in-combination effects are anticipated.~~
High Speed 2 Limited – Provision of new station at Old Oak Common	The site is located within the OPDC area. With an anticipated 250,000 passengers each day, the new station could result in an increase in rail transport leading to reduced air quality and an increase in pedestrians within/visitors to the OPDC area.	All of the stations on the HS2, Crossrail or Great Western Mainline are more than 2.5 km from the European designated sites under consideration. It is not anticipated that significant numbers of passengers would travel this additional distance specifically to visit any of the European designated sites. A HRA screening for HS2 has concluded no likely significant effects on any of the European designated sites under consideration (Booz and Co (UK) Ltd and Temple Group Ltd, 2011). No in-combination effects are anticipated.
OPDC – Oaklands South	Provides 605 homes and space for 200 jobs. The site is located within the OPDC area. Additional population increases could lead to reductions in air quality and recreational pressure on European designated sites.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC ~~London Borough of Ealing –~~ Holbrook House	The site is located within the OPDC area. The provision of ~~424 bed spaces for student accommodation~~280 homes could result in increased recreational pressure on European designated sites.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. No in-combination effects are anticipated.
~~London Borough of Ealing~~OPDC – Portal West	Provides 5~~8078 residential units.~~ homes and 3,200sqm employment space. The site is located within the OPDC area. Additional population increased could lead to increased recreational	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel

Plan/project	Potential effect of plan/Policy	Conclusion
	pressure on European designated sites.	to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
~~London Borough of Ealing~~OPDC – The Portal	Provides 350~~5 residential units.~~ homes and 550sqm employment space. The site is located within the OPDC area. Additional population increased could lead to increased recreational pressure on European designated sites.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
~~London Borough of Ealing~~OPDC – The Perfume Factory North	Provides ~~528 apartments, 6 mews houses and 2 commercial/live work buildings~~400 residential units and 1,400sqm of non-residential space. The site is located within the OPDC area. Additional population increased could lead to increased recreational pressure on European designated sites.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – The Perfume Factory South	Provides 300 homes and 5,000 sqm of office floor space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.

Plan/project	Potential effect of plan/Policy	Conclusion
~~London Borough of Ealing – Carphone Warehouse~~	~~Provides 764 apartments and 5,000sqm of commercial space. The site is located within the OPDC area. Additional population increased could lead to increased recreational pressure on European designated sites.~~	~~For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance.~~ ~~No in-combination effects are anticipated.~~
~~Royal Borough of Kensington and Chelsea – Kensal Canal Side~~	~~Provides 2000 jobs and 3500 homes. The site lies adjacent to the eastern boundary of the OPDC area, approximately 8.5 km north-east of Richmond Park SAC and 9km north-east of Wimbledon Common SAC. Additional population increases could lead to further reductions in air quality and recreational pressure on European designated sites.~~	~~The Kensal Canal Side development is further from the two nearest SACs than the OPDC area and will (on its own) have less of an impact.~~ ~~No in-combination effects are anticipated.~~
~~London Borough of Hammersmith and Fulham – White City~~	~~Provides 10,000 jobs and 6,000 homes of which 5,000 jobs and 1,900 homes have already been provided. The site lies adjacent to the southern boundary of the OPDC area, approximately 6 km north of Richmond Park SAC and 6.5 km north of Wimbledon Common SAC. Additional population increases could lead to further reductions in air quality and recreational pressure on European designated sites~~	~~Although closer to the two nearest SACs than the OPDC area, the distance to the European designated sites is considered to be too great to lead to any significant impacts.~~ ~~No in-combination effects are anticipated.~~
London Borough of Brent - Wembley	Provides 11,000 jobs and 11,500 homes of which 6,400 jobs and 5,500 homes have already been provided. The site lies approximately 1.6 km north of the boundary of the OPDC area, approximately 11.5 km north of Richmond Park SAC and 13 km north of Wimbledon Common SAC. Additional population increases could lead to further reductions in air quality and	The Wembley development is further from the two nearest SACs than the OPDC area and will (on its own) have less of an impact. No in-combination effects are anticipated.

Plan/project	Potential effect of plan/Policy	Conclusion
	recreational pressure on European designated sites	
OPDC – 2 Scrubs Lane	Provides 85 homes and 180sqm of retail and leisure space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – Mitre Yard	Provides 200 homes, 600sqm of retail and leisure space and 500sqm of office space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – North Kensington Gate	Provides 210 homes, 550sqm of retail and leisure space and 900sqm of office space	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – 1 Portal Way	Provides 760 homes, 1,750sqm of retail and leisure space and 1,750sqm of office space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel

Plan/project	Potential effect of plan/Policy	Conclusion
		to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – 2 Portal Way	Provides 38 homes and 5,300sqm of office space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.
OPDC – First Central	Provides 800 homes and 1,000sqm office space.	For similar reasons to those in Section 6.1, population increases within the OPDC area are considered unlikely to result in any significant increases in regular visitor numbers to the European designated sites under consideration due to the distances from the sites, ease of travel to these locations and presence of alternative recreational areas within a shorter distance. Impacts as a result of increased commuter/business travel are not anticipated due to the distances to the European designated sites under consideration. No in-combination effects are anticipated.

6.6 Conclusion

This HRA Screening of the OPDC Regulation 19(2) Second Revised Draft Local Plan has considered the potential implications of the plan for European designated sites within 20 km of the OPDC area boundary.

It is important to note that none of the policies set out in the OPDC Local Plan would lead to direct impacts upon European Sites.

It is considered that the only effects likely to arise as a result of implementation of the OPDC Local Plan are reduced air quality (as a result of construction activities and increased transport during the construction and operational phases) and increased population. These factors could impact the European designated sites through habitat degradation and increased recreational pressure.

The closest European designated site is more than 7 km from the OPDC boundary. It is considered that potential effects are very unlikely to be significant, given the distance between the European designated sites and the nature of the developments likely to arise from the OPDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

The assessment of in-combination effects of various plans and policies revealed that it is not considered that the OPDC Local Plan would contribute to significant in-combination effects, primarily due to the distance of the plans, policies and projects from the European designated sites.

It has therefore been concluded that the OPDC Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects. **As such, it is not proposed to undertake Appropriate Assessment.**

We seek Natural England's opinion and agreement or otherwise with this conclusion.

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DRAWINGS

DRAWING 001-UA008107-UE31D-01

European Sites surrounding the OPDC area

APPENDICES

APPENDIX A

European Sites surrounding the OPDC area

Site Name	Qualifying Features		Vulnerabilities[1]	Site Condition Assessment[2]
	Habitats	Species		
Richmond Park SAC	N/A	Annex II species that are a primary reason for selection of this site • Stag beetle (*Lucanus cervus*)	The site is surrounded by urban area and therefore experiences high levels of recreational pressure. The whole site has been declared a National Nature Reserve (NNR).	Area favourable: 0% Area unfavourable but recovering: 100% Area unfavourable - no change: 0% Area unfavourable - declining: 0% Area destroyed / part destroyed: 0%
Wimbledon Common SAC	Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site • North Atlantic wet heaths with *Erica tetralix* • European dry heaths	Annex II species that are a primary reason for selection of this site • Stag beetle (*Lucanus cervus*)	The site is located in an urban area and therefore experiences heavy recreational pressure	Area favourable: 0% Area unfavourable but recovering: 94.99% Area unfavourable - no change: 5.01% Area unfavourable - declining: 0% Area destroyed / part destroyed: 0%

[1] Taken from Natura 2000 data forms (SAC and SPA) and Ramsar Information Sheets.
[2] Condition summary of the underlying Sites of Special Scientific Interest (SSSI) based on information provided by Natural England (2017a).

Lee Valley SPA	N/A	This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: **Over winter:** Bittern (*Botaurus stellaris*) This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: **Over winter:** Gadwall (*Anas strepera*) Shoveler (*Anas clypeata*)	The whole area is affected by rather eutrophic water quality; but this is to be addressed via AMP3 funding under the Urban Waste Water Treatment Directive. The other main threat is that of human recreational pressure, but this is already well regulated through zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority. There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought. This will be addressed through the Environment Agency review of consents. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994) (which is now superseded by the Conservation of Habitats and Species Regulations 2010 (as amended).	Area favourable: 52.2% Area unfavourable but recovering: 47.8% Area unfavourable - no change: 0% Area unfavourable - declining: 0% Area destroyed / part destroyed: 0%
Lee Valley Ramsar site	N/A	**Ramsar criterion 2** This site supports the nationally scarce plant species whorled water milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman) **Ramsar criterion 6** Species/populations occurring at levels of international importance: Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn:	N/A	See above.

		Northern shoveler (*Anas clypeata*) Species with peak counts in winter: Gadwall (*Anas strepera strepera*)		
South West London Waterbodies SPA	N/A	This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: **Over winter:** Gadwall (*Anas strepera*) Shoveler (*Anas clypeata*)	There is an issue surrounding the potential future decommissioning of reservoirs once they are no longer required for the purposes of water supply; as well as the potential impacts of maintenance works, which may require winter draw-down of reservoirs. Discussions will be required with the current owners and occupiers regarding the future management, maintenance and decommissioning of the larger reservoirs, in order to maintain the site's interest. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994) (superseded by the Conservation of Habitats and Species Regulations 2010 (as amended)). Issues such as arresting (or locally reversing) vegetation succession will be addressed via management plans. Levels of disturbance from recreational activities on one part of the site will be monitored in the winter months to determine their effects on the interest of the site.	Area favourable: 95.6% Area unfavourable but recovering: 3.54% Area unfavourable - no change: 0% Area unfavourable - declining: 0.85% Area destroyed / part destroyed: 0%
South West London Waterbodies Ramsar site	N/A	**Ramsar criterion 6** Species/populations occurring at levels of international importance: Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: Northern shoveler (*Anas clypeata*) Species with peak counts in winter: Gadwall (*Anas strepera strepera*)	N/A	See above.

Epping Forest SAC	Annex I habitats that are a primary reason for selection of this site • Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (Quercion robori-petraeae or Illici-Fagenion) Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site • Northern Atlantic wet heaths with *Erica tetralix* • European dry heaths	Annex II species that are a primary reason for selection of this site • Stag beetle (*Lucanus cervus)*	After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. The forest's epiphytic bryophyte population had been declining due to the death of pollards, shading and pollution from acid rain. The reintroduction of pollarding and wood pasture management is helping to reverse the decline. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act. There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects. In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature (now Natural England) to take forward the management outlined above. A comprehensive management plan was completed and consented in 1998. The site is subject to the provisions of the Epping Forest Act of 1878.	Area favourable: 35.48% Area unfavourable but recovering: 48.17% Area unfavourable - no change: 14.53% Area unfavourable - declining: 1.83% Area destroyed / part destroyed: 0%

APPENDIX B

Conservation objectives

European Site Conservation Objectives for Richmond Park Special Area of Conservation Site code: UK0030246

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- **The extent and distribution of the habitats of qualifying species**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

S1083. *Lucanus cervus*; Stag beetle

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a Special Area of Conservation (SAC). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

Publication date: 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014.

European Site Conservation Objectives for Wimbledon Common Special Area of Conservation Site code: UK0030301

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

S1083. *Lucanus cervus*; Stag beetle

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a Special Area of Conservation (SAC). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

Publication date: 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014.

European Site Conservation Objectives for Lee Valley Special Protection Area Site Code: UK9012111

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely**
- **The population of each of the qualifying features, and,**
- **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Non-breeding)
A051 *Anas strepera*; Gadwall (Non-breeding)
A056 *Anas clypeata*; Northern shoveler (Non-breeding)

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a Special Protection Area (SPA). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

Publication date: 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.

European Site Conservation Objectives for South West London Waterbodies Special Protection Area Site Code: UK9012171

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely**
- **The population of each of the qualifying features, and,**
- **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A051 *Anas strepera*; Gadwall (Non-breeding)
A056 *Anas clypeata*; Northern shoveler (Non-breeding)

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a Special Protection Area (SPA). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

Publication date: 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.

European Site Conservation Objectives for Epping Forest Special Area of Conservation Site Code: UK0012720

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

H9120. Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae or Ilici-Fagenion*); Beech forests on acid soils

S1083. *Lucanus cervus*; Stag beetle

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a Special Area of Conservation (SAC). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

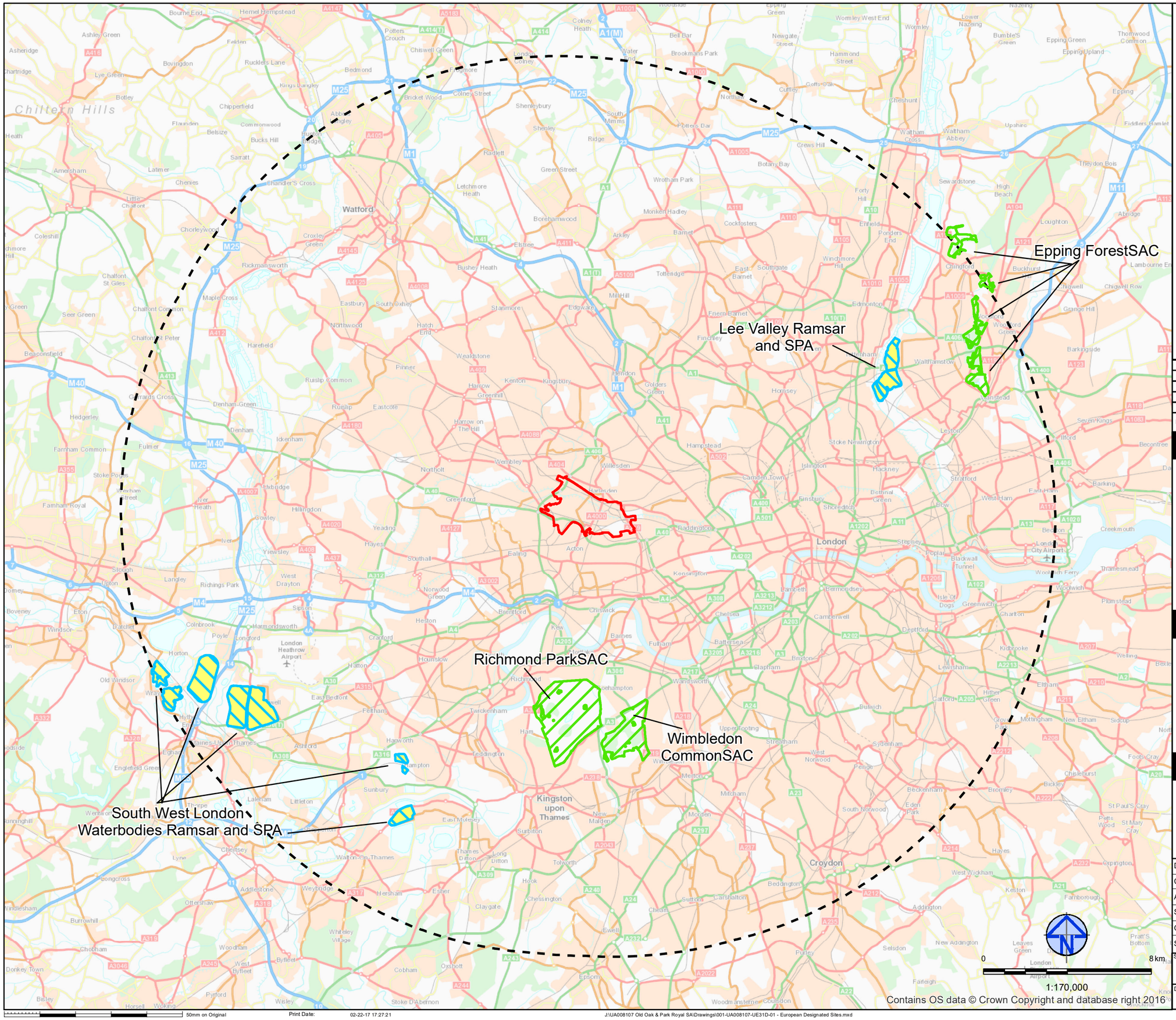
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NOTES:

Legend:

- Site Boundary
- Special Protection Area
- Special Area of Conservation
- Ramsar Site
- 20km Study Area

Rev	Date	Description	Drawn	Check	Approv
01	22/02/17	First draft	RM	LF	SKW

Client

Old Oak and Park Royal Development Corporation (OPDC)

PROJECT:

OPDC Habitats Regulations Assessment Screening Report

Site

OPDC AREA

Client

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Mailing address: City Hall, The Queen's Walk, More London Riverside, London SE1 2AA
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TITLE:

European Sites surrounding the OPDC area

Drawn	R.MILLMAN	Date 22FEB17	Signed
Checked	L.FAY	Date 22FEB17	Signed
Approved	S.WALTERS	Date 22FEB17	Signed
Scale:	1:170,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	S2	Project Number:	UA008107

Suitability Description: Issued for information

Drawing Number: 001-UA008107-UE31D-

Revision: 01

50mm on Original

Print Date: 02-22-17 17:27:21

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